



The Chemical Company

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US EPA RECORDS CENTER REGION 5



1004622

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1551**

December 2, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 141  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 141 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2005. Please find attached the CMS Monthly Progress Report Number 90.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES141.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
REllis -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 90**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Randy Ellis
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	November 1 through November 30, 2005
<b>Date of Report:</b>	December 2, 2005

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- ENSR International began preparing the draft report summarizing the results from the September background well sampling.
- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- ENSR International will complete the draft report summarizing the results from the September background well sampling and submit it to BASF for comments.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Muernberg  
General Manager



The Chemical Company

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K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1544**

November 7, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

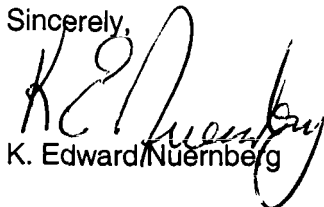
Subject: Monthly Progress Report Number 140  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 140 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2005. Please find attached the CMS Monthly Progress Report Number 89.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES140.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
REllis -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel. (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)



**1g. Key Project Personnel Changes**

Mr. Randy Ellis has replaced Mr. Tim Adams as the Project Manager for ENSR International..

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- ENSR International will prepare a draft report summarizing the results from the September background well sampling.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



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## CMS MONTHLY PROGRESS REPORT NO. 89

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**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Bruce Roberts, BASF Corporation

**ENSR International Project Manager:** Randy Ellis  
**Parsons Eng. Science Project Manager:** Mona Sutherland  
**Waterloo Hydrogeologic Project Manager:** Miln Harvey

**Reporting Period:** October 1 through October 31, 2005

**Date of Report:** November 3, 2005

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- ENSR International completed validating the analytical results from sampling the background wells.
- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

ENSR International sampled selected background wells during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.



The Chemical Company

**Fax Cover Sheet**

To **Mr. Juan Thomas**  
**US Environmental Protection Agency**  
Fax **(312) 353-4788**  
Phone  
Date **November 8, 2005**  
Pages **1 of 4**  
Subject **EPA Monthly Progress Report**  
cc

From **K. Edward Nuernberg**  
Fax **(734) 324-6775**  
Phone **(734) 324-6161**

---

**Comments:**

**Hard Copy to Follow.**



The Chemical Company

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Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7004 1160 0002 8942 1537**

October 5, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

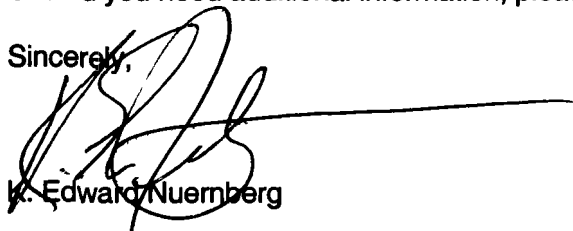
Subject: Monthly Progress Report Number 139  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 139 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2005. Please find attached the CMS Monthly Progress Report Number 88.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES139.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 88**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	September 1 through September 30, 2005
<b>Date of Report:</b>	October 5, 2005

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- ENSR International sampled selected background wells along Biddle Ave during the week of September 12<sup>th</sup>.
- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

ENSR International sampled selected background wells during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- ENSR International will continue preparing for a meeting with USEPA to discuss the risk report.
- ENSR International will validate the analytical results from sampling the background wells and then prepare a draft report summarizing the results.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Muernberg  
General Manager



The Chemical Company

**Fax Cover Sheet**

To **Mr. Juan Thomas**  
**US Environmental Protection Agency**  
Fax **(312) 353-4788**  
Phone  
Date **October 6, 2005**  
Pages **1 of 4**  
Subject **EPA Monthly Progress Report**  
cc

From **K. Edward Nuernberg**  
Fax **(734) 324-6775**  
Phone **(734) 324-6161**

---

**Comments:**

**Hard Copy to Follow.**



The Chemical Company

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K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1520**

September 1, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

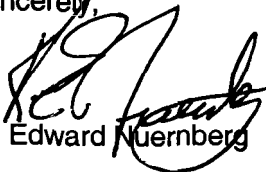
Subject: Monthly Progress Report Number 138  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 138 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2005. Please find attached the CMS Monthly Progress Report Number 87.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES138.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)



## **CMS MONTHLY PROGRESS REPORT NO. 87**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	August 1 through August 31, 2005
<b>Date of Report:</b>	September 1, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

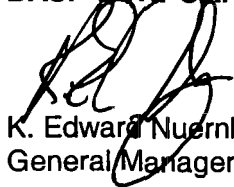
- ENSR International will continue preparing for a meeting with USEPA to discuss the risk report.
- Sampling the background wells along Biddle Ave is scheduled for the week of September 12<sup>th</sup>.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

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K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1513**

August 9, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

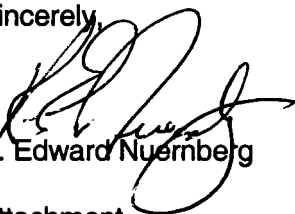
Subject: Monthly Progress Report Number 137  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 137 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2005. Please find attached the CMS Monthly Progress Report Number 86.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES137.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 86**

---

**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Bruce Roberts, BASF Corporation

**ENSR International Project Manager:** Tim Adams  
**Parsons Eng. Science Project Manager:** Mona Sutherland  
**Waterloo Hydrogeologic Project Manager:** Miln Harvey

**Reporting Period:** July 1 through July 31, 2005

**Date of Report:** August 9, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- ENSR International will continue preparing for a meeting with USEPA to discuss the risk report.
- Sampling the background wells along Biddle Ave.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

Aug. 9, 2005 4:49PM

No. 1981 P. 1



The Chemical Company

**Fax Cover Sheet**

To Mr. Juan Thomas  
US Environmental Protection Agency  
Fax (312) 353-4788  
Phone  
Date August 9, 2005  
Pages 1 of 4  
Subject EPA Monthly Progress Report  
cc

From K. Edward Nuernberg  
Fax (734) 324-6775  
Phone (734) 324-6161

---

**Comments:**

Hard Copy to Follow.



The Chemical Company

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Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1506**

July 8, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 136  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 136 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2005. Please find attached the CMS Monthly Progress Report Number 85.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES136.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 85**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	June 1 through June 30, 2005
<b>Date of Report:</b>	July 8, 2005

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.



**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

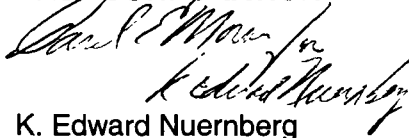
- ENSR International will continue preparing for a meeting with USEPA to discuss the risk report.
- Develop a schedule for sampling the background wells along Biddle Ave.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASE CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

**Fax Cover Sheet**

To Mr. Juan Thomas  
US Environmental Protection Agency  
Fax (312) 353-4788  
Phone  
Date July 8, 2005  
Pages 1 of 4  
Subject EPA Monthly Progress Report  
cc

From K. Edward Nuernberg

Fax (734) 324-6775  
Phone (734) 324-6161

---

**Comments:**

Hard Copy to Follow.



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7004 1160 0002 8942 1490**

June 7, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

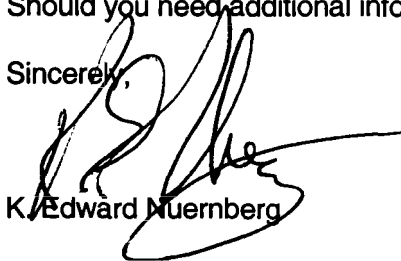
Subject: Monthly Progress Report Number 135  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 135 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2005. Please find attached the CMS Monthly Progress Report Number 84.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES135.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 84**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	May 1 through May 31, 2005
<b>Date of Report:</b>	June 7, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- BASF converted the RFI sampling coordinates from site specific into latitude and longitude. The revised coordinates were submitted to USEPA on May 16<sup>th</sup>.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

### **1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

### **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The latitude and longitude of the RFI sampling locations were submitted to USEPA.

### **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

#### **3a. Anticipated Work**

- ENSR International will continue preparing for a meeting with USEPA to discuss the risk report.
- Develop a schedule for sampling the background wells along Biddle Ave.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

#### **3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

**Fax Cover Sheet**

To **Mr. Juan Thomas**  
**US Environmental Protection Agency**  
Fax **(312) 353-4788**  
Phone  
Date **June 7, 2005**  
Pages **1 of 4**  
Subject **EPA Monthly Progress Report**  
cc

From **K. Edward Nuernberg**  
Fax **(734) 324-6775**  
Phone **(734) 324-6161**

---

**Comments:**

**Hard Copy to Follow.**



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1476**

May 6, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

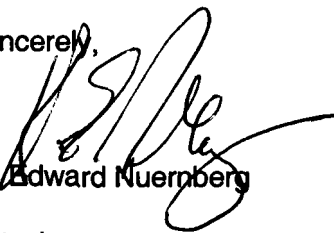
Subject: Monthly Progress Report Number 134  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 134 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2005. Please find attached the CMS Monthly Progress Report Number 83.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES134.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 83**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	April 1 through April 30, 2005
<b>Date of Report:</b>	May 6, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The Risk Screening Summary Report was submitted to USEPA on April 6<sup>th</sup>.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.



**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The Risk Screening Summary Report submitted to USEPA on April 6<sup>th</sup>.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will convert the RFI sampling coordinates from site specific into latitude and longitude per USEPA's request. The revised coordinates will be submitted to USEPA.
- ENSR International will continue preparing for a meeting with USEPA to discuss the risk report.
- Develop a schedule for sampling the background wells along Biddle Ave.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



The Chemical Company

**Fax Cover Sheet**

To Mr. Juan Thomas  
US Environmental Protection Agency  
Fax (312) 353-4788  
Phone  
Date May 9, 2005  
Pages 1 of 4  
Subject EPA Monthly Progress Report  
cc

From K. Edward Nuernberg  
Fax (734) 324-6775  
Phone (734) 324-6161

---

**Comments:**

Hard Copy to Follow.

George Hamper  
Group



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1452**

April 11, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 133  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 133 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2005. Please find attached the CMS Monthly Progress Report Number 82.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES133.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

## CMS MONTHLY PROGRESS REPORT NO. 82

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	March 1 through March 31, 2005
<b>Date of Report:</b>	April 11, 2005

---

### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- ENSR International completed the preparation of the risk database, conducted the risk screening, and wrote the risk screening report. The Risk Screening Summary Report was submitted to USEPA on April 6<sup>th</sup>.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No additional field activities were conducted during the month.

#### 1f. Groundwater Modeling Activities and Summary of Findings

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The Risk Screening Summary Report submitted to USEPA on April 6<sup>th</sup>.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

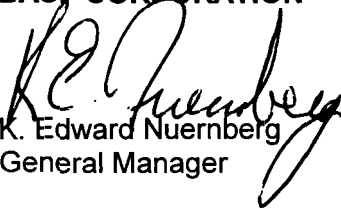
- ENSR International will begin preparing for a meeting with USEPA to discuss the risk report.
- Develop a schedule for sampling the background wells along Biddle Ave.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



The Chemical Company

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Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1469**

March 10, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

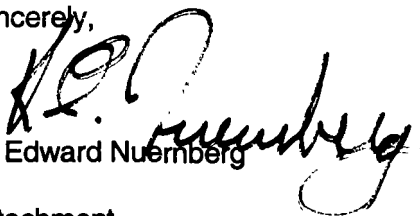
Subject: Monthly Progress Report Number 132  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 132 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2005. Please find attached the CMS Monthly Progress Report Number 81.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES132.doc

cc: LAubuchon – MDEQ Warren  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Warren  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 81**

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**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Bruce Roberts, BASF Corporation

**ENSR International Project Manager:** Tim Adams  
**Parsons Eng. Science Project Manager:** Mona Sutherland  
**Waterloo Hydrogeologic Project Manager:** Miln Harvey

**Reporting Period:** February 1 through February 28, 2005

**Date of Report:** March 10, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- Per USEPA's request, BASF submitted to USEPA a table containing RFI sample IDs and associated site coordinates.
- ENSR International compiled the Michigan Part 201 criteria into the correct format for use in risk screening, including QA, and resolved of inconsistencies between electronic and paper versions of the criteria.
- ENSR International, Parsons Engineering Science, and BASF participated in a call with USEPA on 2/11/05 to discuss the USEPA's 2/1/05 comment letter on the risk screening work plan
- ENSR International reviewed and compared USEPA and MDEQ criteria for seven compounds identified by USEPA in the comment letter, summarized results in emails, and participated in telephone calls with BASF.
- BASF submitted rationale, in an email, on March 1<sup>st</sup> for not using the Region IX PRGs for the seven compounds identified by USEPA in advance of a call scheduled for March 4<sup>th</sup>.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

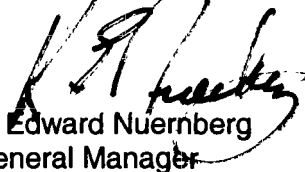
- BASF will and its consultants resolve the toxicity issues with USEPA on the seven compounds identified by USEPA.
- ENSR International will finalize the screening criteria database, perform the risk screening on soil and groundwater, and prepare a draft summary report.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



**BASF**

The Chemical Company

**Fax Cover Sheet**

To: Mr. Juan Thomas  
US Environmental Protection Agency  
Fax: (312) 353-4788  
Phone:  
Date: March 10, 2005  
Pages: 1 of 4  
Subject: EPA Monthly Progress Report  
CC:

From: K. Edward Nuernberg  
Fax: (734) 324-6775  
Phone: (734) 324-6161

---

**Comments:**

Hard Copy to Follow.



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1445**

February 7, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

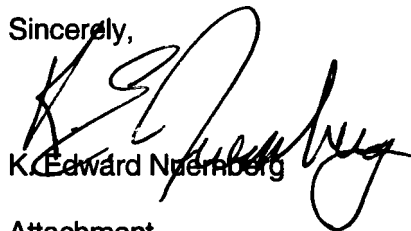
Subject: Monthly Progress Report Number 131  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 131 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2005. Please find attached the CMS Monthly Progress Report Number 79.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES131.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 80**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	January 1 through January 31, 2005
<b>Date of Report:</b>	February 4, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- Per USEPA's request, ENSR International converted the data from EQUIS format into Microsoft® Excel and submitted a copy to USEPA.
- ENSR International continued compiling the MDEQ risk screening criteria into a database
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables were submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will and its consultants will await feedback from USEPA on the draft risk screening work plan.
- ENSR International will complete compiling the MDEQ risk screening criteria into a database and begin the risk screening.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

**Fax Cover Sheet**

To Mr. Juan Thomas  
US Environmental Protection Agency  
Fax (312) 353-4788  
Phone  
Date February 7, 2005  
Pages 1 of 4  
Subject EPA Monthly Progress Report  
cc

From K. Edward Nuernberg

Fax (734) 324-6775

Phone (734) 324-6161

---

**Comments:**

Hard Copy to Follow.



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1438**

January 6, 2005

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

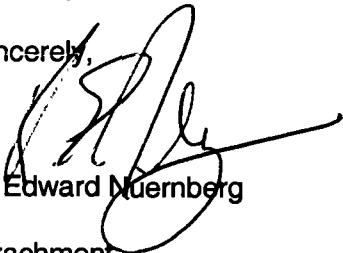
Subject: Monthly Progress Report Number 130  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 130 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2004. Please find attached the CMS Monthly Progress Report Number 79.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES130.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
JCashin – Bacon Memorial Public Library  
TAdams -- ENSR

**BASF Corporation**  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 79**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	December 1 through December 31, 2004
<b>Date of Report:</b>	January 6, 2005

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- ENSR International verified data accuracy and completeness with BASF.
- ENSR International finished converting the data into EQulS format; a copy was sent to USEPA.
- ENSR International started compiling the MDEQ risk screening criteria into a database
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The draft risk screening work plan was submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will and its consultants will await feedback from USEPA on the draft risk screening work plan.
- ENSR International will complete compiling the MDEQ risk screening criteria into a database
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager





The Chemical Company

**Fax Cover Sheet**

To **Mr. Juan Thomas**  
**US Environmental Protection Agency**  
Fax **(312) 353-4788**  
Phone  
Date **January 7, 2005**  
Pages **1 of 4**  
Subject **EPA Monthly Progress Report**  
cc

From **K. Edward Nuernberg**  
Fax **(734) 324-6775**  
Phone **(734) 324-6161**

---

**Comments:**

**Hard Copy to Follow.**



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 1421**

December 6, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 129  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 129 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2004. Please find attached the CMS Monthly Progress Report Number 78.

Should you need additional information, please contact us at your convenience.

Sincerely,

K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES129.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
JCashin – Bacon Memorial Public Library  
TAdams – ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 78**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	November 1 through November 30, 2004
<b>Date of Report:</b>	December 6, 2004

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- BASF corrected the inconsistencies found in the historical analytical data and sent the corrected data to ENSR International and Parsons.
- ENSR International submitted a final draft risk screening work plan to BASF.
- BASF submitted ENSR International's draft risk screening work plan to USEPA via. Email on December 3<sup>rd</sup>.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The draft risk screening work plan was submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

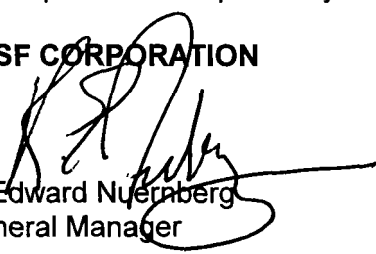
- ENSR International will finish converting the data into EQUIS format; a copy will be sent to USEPA.
- BASF will and its consultants will await feedback from USEPA on the draft risk screening work plan.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 4729**

November 8, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 128  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 128 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2004. Please find attached the CMS Monthly Progress Report Number 77.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES128.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
JCashin – Bacon Memorial Publ  
TAdams -- ENSR

**BASF Corporation**  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 77**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	October 1 through October 31, 2004
<b>Date of Report:</b>	November 8, 2004

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- BASF submitted the final CMS Supplemental Groundwater Sampling Results report to USEPA.
- ENSR International submitted a draft risk screening work plan to BASF and BASF submitted comments to ENSR International.
- ENSR International began reviewing the historical analytical data and found some inconsistencies such as duplicate information and rejected data mixed with viable data.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

USEPA expressed several questions and concerns regarding how the Preliminary Risk Assessment compared to MDEQ's Part 201 program. BASF responded to the concerns and questions.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The CMS Supplemental Groundwater Sampling Results report was submitted to USEPA during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

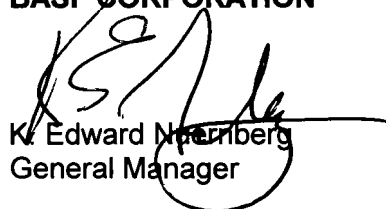
- ENSR International will finalize drafting a risk screening work plan and submit it to BASF.
- BASF will correct the inconsistencies found in the historical analytical data and send the corrected data to ENSR International and Parsons.
- BASF will submit a draft a risk screening work plan to USEPA to initiate discussions.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Neuenberg  
General Manager





The Chemical Company

**Fax Cover Sheet**

To **Mr. Juan Thomas**  
**US Environmental Protection Agency**  
Fax **(312) 353-4788**  
Phone  
Date **November 8, 2004**  
Pages **1 of 5**  
Subject **EPA Monthly Progress Report**  
cc

From **K. Edward Nuernberg**  
Fax **(734) 324-6775**  
Phone **(734) 324-6161**

---

**Comments:**

**Hard Copy to Follow.**



The Chemical Company

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Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 4712**

October 6, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

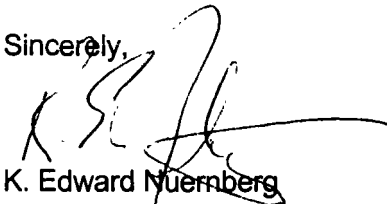
Subject: Monthly Progress Report Number 127  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 127 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2004. Please find attached the CMS Monthly Progress Report Number 76.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES127.doc

cc: LAubuchon -- MDEQ Livonia  
RBlayer -- MDEQ Lansing  
MHarvey -- WHI  
BRoberts -- BASF

MSutherland -- PES  
BVens -- MDEQ Livonia  
JCashin -- Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 76**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	September 1 through September 30, 2004
<b>Date of Report:</b>	October 6, 2004

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- ENSR International submitted the final CMS Supplemental Groundwater Sampling Results report to BASF.
- ENSR International began drafting a risk assessment work plan.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

USEPA expressed several questions and concerns regarding how the Preliminary Risk Assessment compared to MDEQ's Part 201 program. BASF responded to the concerns and questions.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The CMS Supplemental Groundwater Sampling Results report was generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- ENSR International will finalize drafting a risk assessment work plan submit it to BASF.
- BASF will submit the CMS Supplemental Groundwater Sampling Results report to USEPA.
- BASF will submit a draft a risk assessment work plan to USEPA to initiate discussions.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

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October 5, 2004

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7003 3110 0006 0424 2199**

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: CMS Supplemental Groundwater Sampling Results Report

Dear Mr. Thomas:

Enclosed are three copies of ENSR's report entitled CMS Supplemental Groundwater Sampling Results for the BASF North Works Facility Wyandotte, Michigan. Low flow sampling techniques were used and mercury samples were analyzed using method 1631.

If you have any questions, please call me at (734) 324-6298.

Sincerely yours,

Bruce Roberts  
Project Manager

enclosure

cc: Ms. Barbara Wallace – Bacon Memorial Public Library  
Ms. Beth Vens – MDEQ Livonia

cc w/o enclosure:

Mr. Brian Diepeveen – BASF  
Ms. Mona Sutherland – PES  
Mr. Tim Adams – ENSR  
Mr. Larry AuBuchon – MDEQ Livonia  
Ms. Ronda Blayer – MDEQ Lansing



The Chemical Company

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K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 4705**

September 8, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 126  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 126 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2004. Please find attached the CMS Monthly Progress Report Number 75.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES126.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams – ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## **CMS MONTHLY PROGRESS REPORT NO. 75**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	MiIn Harvey
<b>Reporting Period:</b>	August 1 through August 31, 2004
<b>Date of Report:</b>	September 9, 2004

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- ENSR International revised the draft sampling results letter report and re-submitted it to BASF and BASF responded back to ENSR
- BASF contacted USEPA on August 18<sup>th</sup> concerning our July 13<sup>th</sup> response. USEPA is still evaluating it.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

USEPA expressed several questions and concerns regarding how the Preliminary Risk Assessment compared to MDEQ's Part 201 program. BASF responded to the concerns and questions.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

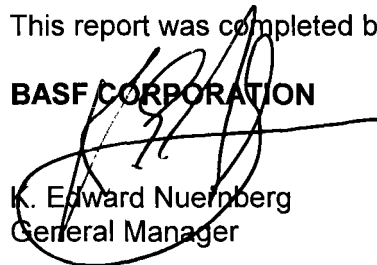
- ENSR International will finalize the sampling results letter report and re-submit it to BASF.
- BASF will review the letter report from ENSR International and submit it to USEPA.
- ENSR International will begin drafting a risk assessment work plan.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager





The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7004 1160 0002 8942 4699**

August 9, 2004:

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 125  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 125 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2004. Please find attached the CMS Monthly Progress Report Number 74.

Should you need additional information, please contact us at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "K. E. Nuernberg", written over a printed name.

K. Edward Nuernberg

**Attachment**

I:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES125.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams – ENSR



The Chemical Company

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Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7004 1160 0002 8942 4699**

August 9, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

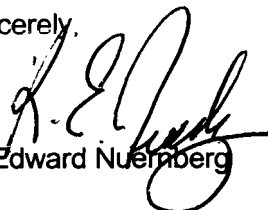
Subject: Monthly Progress Report Number 125  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 125 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2004. Please find attached the CMS Monthly Progress Report Number 74.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES125.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams -- ENSR

**BASF Corporation**  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## CMS MONTHLY PROGRESS REPORT NO. 74

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	July 1 through July 31, 2004
<b>Date of Report:</b>	August 9, 2004

---

### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF submitted a response to USEPA's May 13<sup>th</sup> comments.
- BASF continued to evaluate potential remediation alternatives.
- BASF requested file information under the Freedom of Information Act from USEPA and MDEQ concerning any cumulative risk discussions that have been held.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

USEPA expressed several questions and concerns regarding how the Preliminary Risk Assessment compared to MDEQ's Part 201 program. BASF will address the concerns and questions.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

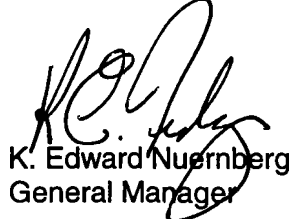
- BASF will contact USEPA concerning the response to USEPA's May 13<sup>th</sup> comments.
- ENSR International will revise the draft sampling results letter report and re-submit it to BASF.
- BASF will review the revised draft letter report from ENSR International and submit to USEPA.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 1940 0001 4175 7430**

July 8, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

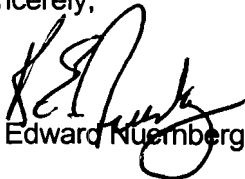
Subject: Monthly Progress Report Number 124  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 124 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2004. Please find attached the CMS Monthly Progress Report Number 73.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES124.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams -- ENSR

BASF Corporation  
1609 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## CMS MONTHLY PROGRESS REPORT NO. 73

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	June 1 through June 30, 2004
<b>Date of Report:</b>	July 8, 2004

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF continued to evaluate USEPA's comments.
- BASF continued to evaluate potential remediation alternatives.
- ENSR International completed the draft sampling results letter report and submitted it to BASF during the first week of June. A conference call was held on June 24<sup>th</sup> between BASF and ENSR to discuss the draft report.
- On June 4<sup>th</sup> via email, BASF requested information concerning any cumulative risk discussions held between USEPA and MDEQ as a result of their March 2002 technical meetings.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

USEPA expressed several questions and concerns regarding how the Preliminary Risk Assessment compared to MDEQ's Part 201 program. BASF will address the concerns and questions.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will respond to USEPA's May 13<sup>th</sup> comments.
- BASF will try to determine what Part 201 risk characterization activities need to be undertaken.
- BASF will request file information under the Freedom of Information Act from USEPA and MDEQ concerning any cumulative risk discussions that have been held.
- ENSR International will revise the draft sampling results letter report and re-submit it to BASF.
- BASF will review the revised draft letter report from ENSR International and submit to USEPA.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.

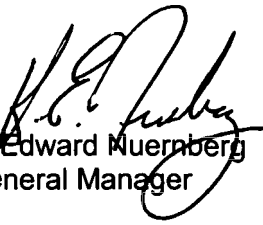
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

*BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.*

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager





The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7001 1940 0001 4175 7423**

June 2, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 123  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 123 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2004. Please find attached the CMS Monthly Progress Report Number 72.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES123.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PF  
BVens – MDEC  
BWallace – P  
TAdams –

**BASF Corporation**  
1809 Biddle Avenue  
Wyandotte, MI 48192-3729  
Tel: (734) 324-6161  
[www.basf.com/usa](http://www.basf.com/usa)

## CMS MONTHLY PROGRESS REPORT NO. 72

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	May 1 through May 31, 2004
<b>Date of Report:</b>	June 2, 2004

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF received comments from USEPA on May 13<sup>th</sup>, via email, concerning their evaluation of the Preliminary Risk Assessment that was submitted as part of the RFI. USEPA's evaluation is essential to their being able to effectively move forward into the corrective measures study phase as well as their evaluating the existing data necessary towards achieving our two Environmental Indicator performance goals of "Current Human Exposures Under Control" and "Migration of Contaminated Groundwater Under Control", i.e., EI 725 and 750 respectively. A conference call with representatives from USEPA, BASF, and PES was held on May 27<sup>th</sup> to discuss the comments.

Since the RFI was submitted, USEPA and the Michigan Department of Environmental Quality (MDEQ) have entered into a Memorandum of Understanding concerning using MDEQ's Part 201 program at RCRA Corrective Action sites in Michigan.

- BASF began evaluating USEPA's comments.
- BASF continued to evaluate potential remediation alternatives.
- ENSR International completed the draft sampling results letter report and will submit it to BASF during the first week of June.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

**1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

USEPA expressed several questions and concerns regarding how the Preliminary Risk Assessment compared to MDEQ's Part 201 program. BASF will address the concerns and questions.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will begin responding to USEPA's May 13<sup>th</sup> comments.
- BASF will try to determine what Part 201 risk characterization activities need to be undertaken.
- ENSR International will submit the draft sampling results letter report to BASF.
- BASF will review the draft letter report from ENSR International.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model.

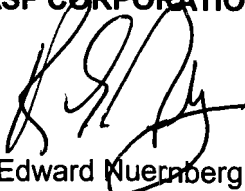
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

### **3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



The Chemical Company

Helping Make  
Products Better™

K. Edward Nuernberg  
General Manager  
N-KUN / Wyandotte Site Administration

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7001 2510 0008 9246 0825**

May 7, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

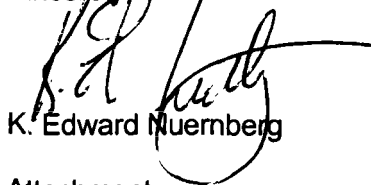
Subject: Monthly Progress Report Number 122  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 122 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2004. Please find attached the CMS Monthly Progress Report Number 71.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES122.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams – ENSR

## CMS MONTHLY PROGRESS REPORT NO. 71

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	April 1 through April 30, 2004
<b>Date of Report:</b>	May 7, 2004

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International finished validating the analytical results and incorporated the analytical data into the database.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

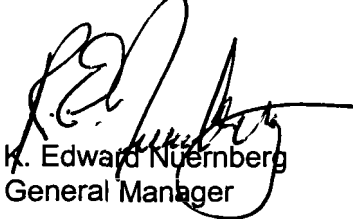
- ENSR International will finish analyzing the analytical data from the re-sampled monitoring wells and draft a letter report.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



H. Edward Nuernberg  
General Manager



The Chemical Company

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**  
**7001 2510 0008 9246 0832**

April 7, 2004

K. Edward Nuernberg  
General Manager  
N-KUN / Wyandotte Site Administration

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 121  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 121 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2004. Please find attached the CMS Monthly Progress Report Number 70.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES121.doc

cc: TAdams – ENSR  
LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI

BRoberts – BASF  
MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library



## CMS MONTHLY PROGRESS REPORT NO. 70

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	March 1 through March 31, 2004
<b>Date of Report:</b>	April 6, 2004

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

*During this reporting period, the following occurred:*

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International finished validating the analytical results.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

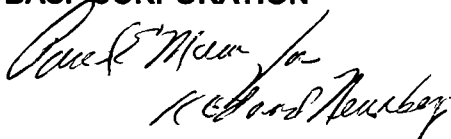
- ENSR International will incorporate the analytical data from the re-sampled monitoring wells into the database, review the data, and draft a letter report.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0849**

March 1, 2004

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 120  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 120 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2004. Please find attached the CMS Monthly Progress Report Number 69.

Should you need additional information, please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES120.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
MHarvey – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams – ENSR

## CMS MONTHLY PROGRESS REPORT NO. 69

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Miln Harvey
<b>Reporting Period:</b>	February 1 through February 29, 2004
<b>Date of Report:</b>	March 1, 2004

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International finished receiving the analytical data and began validating the analytical results.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

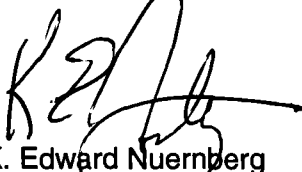
- ENSR International will finish validating and begin reviewing the analytical data from the re-sampled monitoring wells.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0863**

December 2, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

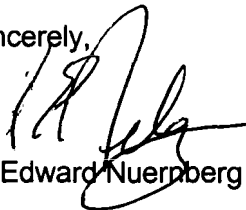
Subject: Monthly Progress Report Number 117  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 117 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2003. Please find attached the CMS Monthly Progress Report Number 66.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES117.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 66**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	November 1 through November 30, 2003
<b>Date of Report:</b>	December 2, 2003

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International's final work plan for sampling selected monitoring wells was sent to USEPA.
- An off site background well was installed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- ENSR International has scheduled field work for re-sampling selected monitoring wells during the first two weeks of December.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



**BASF Corporation**

**BASF**

**K. Edward Nuernberg**  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7001 2510 0008 9246 0801**

November 7, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

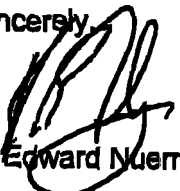
Subject: Monthly Progress Report Number 116  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 116 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2003. Please find attached the CMS Monthly Progress Report Number 65.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
\\ecology\Jack Lanigan\EPA Progress Reports\PRGRES116.doc

cc: LAubuchon - MDEQ Livonia  
RBlayer - MDEQ Lansing  
PMartin - WHI  
BRoberts - BASF

MSutherland - PES  
BVens - MDEQ Livonia  
BWallace - Bacon Memorial Public Library  
TAdams - ENSR

**CMS MONTHLY PROGRESS REPORT NO. 65**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	October 1 through October 31, 2003
<b>Date of Report:</b>	November 6, 2003

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**1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD****1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International developed a final work plan for sampling selected.

**1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**Monthly Progress Report  
6 November 2003**

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- ENSR International will schedule field work for re-sampling selected monitoring wells.
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**



**TELEFAX**

- ☐ URGENT  
☐ REPLY NEEDED  
☐ FOR YOUR INFORMATION

NUMBER OF PAGES:   
(including cover sheet)  
HARD COPY TO FOLLOW ☒

**DATE:**

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0870**

October 7, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

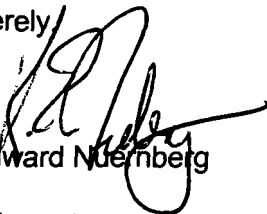
Subject: Monthly Progress Report Number 115  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 115 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2003. Please find attached the CMS Monthly Progress Report Number 64.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES115.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams -- ENSR

## **CMS MONTHLY PROGRESS REPORT NO. 64**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	September 1 through September 30, 2003
<b>Date of Report:</b>	October 6, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International developed a draft work plan for sampling selected wells and completed flux estimates for constituents of concern.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.
- ENSR International will complete the work plan for re-sampling selected monitoring wells and schedule field work.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Niernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0887**

September 5, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

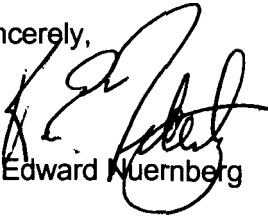
Subject: Monthly Progress Report Number 114  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 114 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2003. Please find attached the CMS Monthly Progress Report Number 63.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES114.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library  
TAdams -- ENSR



## CMS MONTHLY PROGRESS REPORT NO. 63

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>ENSR International Project Manager:</b>	Tim Adams
<b>Parsons Eng. Science Project Manager:</b>	Mona Sutherland
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	August 1 through August 31, 2003
<b>Date of Report:</b>	September 3, 2003

---

### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- ENSR International started developing a work plan for sampling selected wells and made preliminary flux estimates for constituents of concern.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.
- ENSR International will complete the work plan for re-sampling selected monitoring wells, finalize the flux calculations, and schedule field work.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0894**

August 1, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

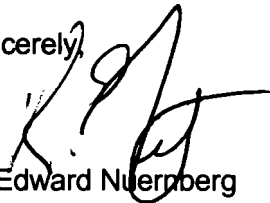
Subject: Monthly Progress Report Number 113  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 113 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2003. Please find attached the CMS Monthly Progress Report Number 62.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES113.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 62**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	July 1 through July 31, 2003
<b>Date of Report:</b>	August 1, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

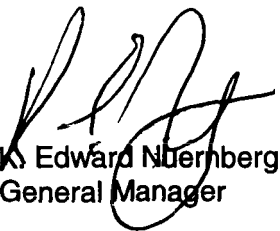
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.
- ENSR International has been retained by BASF and will develop a work plan for re-sampling selected monitoring wells.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0900**

July 2, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

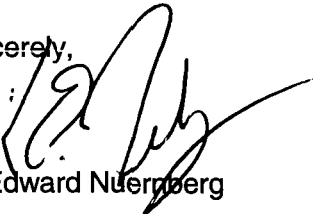
Subject: Monthly Progress Report Number 112  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 112 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2003. Please find attached the CMS Monthly Progress Report Number 61.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES112.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 61

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	June 1 through June 30, 2003
<b>Date of Report:</b>	July 1, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0795**

June 4, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

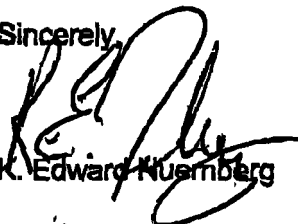
Subject: Monthly Progress Report Number 111  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 111 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2003. Please find attached the CMS Monthly Progress Report Number 60.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

K:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES111.doc

cc: LAubuchon - MDEQ Livonia  
RBlayer - MDEQ Lansing  
PMartin - WHI  
BRoberts - BASF

MSutherland - PES  
BVens - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

**CMS MONTHLY PROGRESS REPORT NO. 60**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	May 1 through May 31, 2003
<b>Date of Report:</b>	June 3, 2003

---

**1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD****1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

**1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

Monthly Progress Report  
3 June 2003

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



- ☐ URGENT  
☐ REPLY NEEDED  
☐ FOR YOUR INFORMATION

NUMBER OF PAGES:  
(including cover sheet)

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**DATE:** June 3, 2003

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 008 9246 0917**

May 5, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-SJ)  
77 West Jackson Street  
Chicago, Illinois 60604

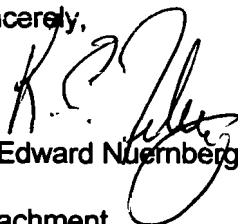
Subject: Monthly Progress Report Number 110  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 110 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2003. Please find attached the CMS Monthly Progress Report Number 59.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
I:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES110.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts -- BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 59**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	April 1 through April 30, 2003
<b>Date of Report:</b>	May 1, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



**TELEFAX**

- ☐ URGENT  
☐ REPLY NEEDED  
☐ FOR YOUR INFORMATION

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**DATE:** May 5, 2003

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0924**

April 7, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

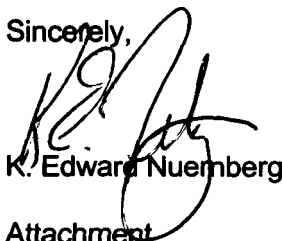
Subject: Monthly Progress Report Number 109  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 109 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2003. Please find attached the CMS Monthly Progress Report Number 58.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES109.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 58**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	March 1 through March 31, 2003
<b>Date of Report:</b>	April 7, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



**TELEFAX**

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NUMBER OF PAGES:   
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**DATE:** April 7, 2003

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0931**

March 10, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

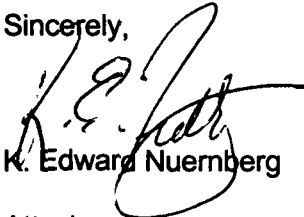
Subject: Monthly Progress Report Number 108  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 108 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2003. Please find attached the CMS Monthly Progress Report Number 57.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES108.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 57**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	February 1 through February 28, 2003
<b>Date of Report:</b>	March 10, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

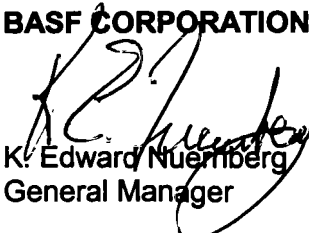
- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

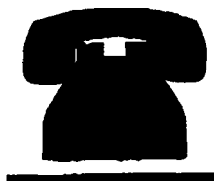
This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



**TELEFAX**

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**DATE:** March 10, 2003

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 008 9246 0948**

February 6, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

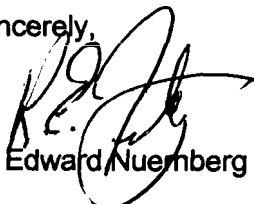
Subject: Monthly Progress Report Number 107  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 107 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2003. Please find attached the CMS Monthly Progress Report Number 56.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES107.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 56**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	January 1 through January 31, 2003
<b>Date of Report:</b>	February 5, 2003

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives. Four remediation scenarios have been simulated.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- BASF sent USEPA two replacement copies of RCRA Corrective Measures Study Field Program Report dated March 2000.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



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**DATE:** February 6, 2003

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0955**

January 6, 2003

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

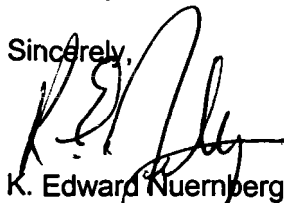
Subject: Monthly Progress Report Number 106  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 106 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2002. Please find attached the CMS Monthly Progress Report Number 55.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES106.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 55**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	December 1 through December 31, 2002
<b>Date of Report:</b>	January 3, 2003

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives. Four remediation scenarios have been simulated.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed. .

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report and is waiting for a response from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



**TELEFAX**

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**DATE:** January 6, 2003

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0788**

December 9, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

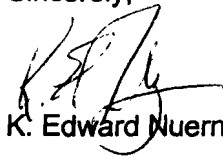
Subject: Monthly Progress Report Number 105  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 105 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2002. Please find attached the CMS Monthly Progress Report Number 54.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES105.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 54**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	November 1 through November 30, 2002
<b>Date of Report:</b>	December 9, 2002

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives. A fourth remediation scenario has been simulated.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed. .

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

#### **1f. Groundwater Modeling Activities and Summary of Findings**

A fourth remediation scenario incorporating extensive HDPE wall construction around much of the site perimeter was simulated. The results of this simulation indicate that the HDPE wall would reduce on-site groundwater flow and hydraulic control would be effective over most of the site.

#### **1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

#### **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

#### **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

##### **3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

##### **3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**



**TELEFAX**

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**DATE:** December 10, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0962**

November 5, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 104  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

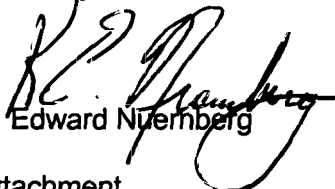
Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 104 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2002. Please find attached the CMS Monthly Progress Report Number 53.

BASF appreciates USEPA's commitment to tour our site; you are welcome to return at any time.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES104.doc

cc: LAubuchon – MDEQ Livonia  
RBlayer – MDEQ Lansing  
PMartin – WHI  
BRoberts – BASF

MSutherland – PES  
BVens – MDEQ Livonia  
BWallace – Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 53**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	October 1 through October 31, 2002
<b>Date of Report:</b>	October 31, 2002

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Messrs. Juan Thomas, Dave Petrovski, and Steve Rock with USEPA attended a meeting at Northworks with BASF personnel on October 17<sup>th</sup>. One of the objectives of the meeting was to give USEPA personnel the opportunity to tour the site.
- BASF continued to evaluate potential remediation alternatives. A fourth remediation scenario has been simulated and draft results produced.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.
- Waterloo Hydrogeologic prepared a response to a question from Juan Thomas regarding groundwater modeling calibration statistics and BASF submitted the response to USEPA.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Still have not received complete comments from USEPA.

### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

The 15 wells that were sampled in late August and early September contained mainly inorganic constituents and only a few organic constituents.

### **1f. Groundwater Modeling Activities and Summary of Findings**

A fourth remediation scenario incorporating extensive HDPE wall construction around much of the site perimeter was simulated. Draft results are currently being reviewed by BASF. The results of this simulation indicate that the HDPE wall would reduce on-site groundwater flow and hydraulic control may be effective over most of the site.

### **1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

## **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

## **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

### **3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- WHI will finalize the fourth groundwater modeling scenario.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.

### **3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0979**

October 8, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

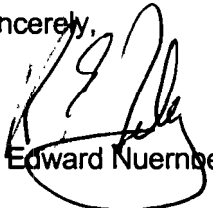
Subject: Monthly Progress Report Number 103  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 103 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2002. Please find attached the CMS Monthly Progress Report Number 52.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES103.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI



---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	September 1 through September 31, 2002
<b>Date of Report:</b>	October 8, 2002

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## **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives. A fourth remediation scenario has been determined and forwarded to WHI for simulation.
- The USEPA Project Manager, Juan Thomas, has forwarded one question regarding the information presented to them by Waterloo Hydrogeologic, Inc. at the July 23<sup>rd</sup> meeting, specifically focused on the groundwater modeling calibration statistics. WHI is currently preparing a response to this comment, detailing the methods for calculation of modeling statistics and how that relates to the  $R^2$  value of the goodness of fit.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

### **1d. Problems/Issues Encountered and Resolutions**

BASF has not received a response from USEPA concerning the corrective action objectives it proposed to USEPA; work on the Draft CMS Report can not resume until BASF and USEPA agree upon the corrective action objectives. BASF will contact USEPA again concerning the objectives.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No additional field activities were conducted during the month.

**1f. Groundwater Modeling Activities and Summary of Findings**

No additional groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- WHI will conduct the fourth groundwater modeling scenario.
- BASF and its consultants will await formal feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in a timely manner.
- BASF will review the analytical data from the groundwater sampling conducted at the end of August.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF has requested an extension of time for submitting the Draft CMS Report.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7001 2510 0008 9246 0979**

October 8, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 103  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 103 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2002. Please find attached the CMS Monthly Progress Report Number 52.

Should you need additional information, please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

Attachment

I:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES103.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVene - MDEQ Livonia  
PMartin - WHI

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 0993**

September 9, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 102  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 102 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2002. Please find attached the CMS Monthly Progress Report Number 51.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES102.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## CMS MONTHLY PROGRESS REPORT NO. 51

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	August 1 through August 31, 2002
<b>Date of Report:</b>	September 6, 2002

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF continued to evaluate potential remediation alternatives.
- BASF requested a time extension for submitting the Draft CMS Report.
- WHI started preparing the Summary and Conclusions portions of the final groundwater modeling report.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

USEPA personnel have not been able to review the information presented to them by BASF, Parsons Engineering Science, Inc., and Waterloo Hydrogeologic, Inc. at the July 23<sup>rd</sup> meeting.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

BASF personnel collected water samples for analyses from 15 wells on August 29<sup>th</sup>, August 30<sup>th</sup>, and September 3<sup>rd</sup>. The majority of the wells were near Biddle Avenue and the analytical results will be used to help determine the pretreatment required, if any.

**1f. Groundwater Modeling Activities and Summary of Findings**

No additional groundwater modeling activities were conducted during the month.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

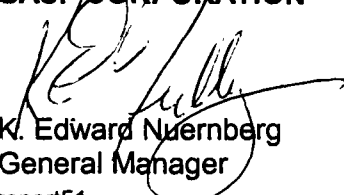
- BASF will continue to evaluate potential remediation alternatives.
- WHI will conduct another groundwater modeling scenario.
- BASF and its consultants will await feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.
- PES will begin preparing the Draft CMS Report if BASF and USEPA are able to agree upon draft corrective measures objectives in the near future.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. BASF requested an extension of time for submitting the Draft CMS Report.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager  
report51

BASF Corporation

**BASF**



**TELEFAX**

- ☐ URGENT  
☐ REPLY NEEDED  
☐ FOR YOUR INFORMATION

NUMBER OF PAGES:  
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4

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**DATE:** September 9, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 1006**

August 8, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 101  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 101 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2002. Please find attached the CMS Monthly Progress Report Number 50.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES101.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI



## **CMS MONTHLY PROGRESS REPORT NO. 50**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	July 1 through July 31, 2002
<b>Date of Report:</b>	August 7, 2002

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- A meeting was held in Chicago on July 23<sup>rd</sup> to present results to date to USEPA. Mr. Roberts, with BASF, summarized information from the Facility Investigation Report of Current Conditions, previous investigations, the 1986 State Consent Decree, the Conceptual Exposure Model, and key findings from the RFI. Ms. Mona Sutherland, Mr. Bill Borchardt, and Mr. Sasa Jazic, with Parsons Engineering Science Inc., summarized information from the CMS field work. Mr. Dave Tamblyn, with Waterloo Hydrogeologic Inc., summarized information from the Conceptual Hydrogeologic Model & Model Calibration Report. Mr. Roberts also presented draft corrective action objectives.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No problems / issues were encountered during this reporting period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling, analytical or field activities were completed during this reporting period.

**1f. Groundwater Modeling Activities and Summary of Findings**

Groundwater modeling activities were limited to the preparation and presentation of the results to date as documented in the report: Conceptual Hydrogeologic Model & Model Calibration Report by WHI dated June 2002.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables/reports were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will continue to evaluate potential remediation alternatives.
- BASF and its consultants will await feedback from USEPA on the conceptual groundwater model and draft corrective measures objectives.

**3b. Anticipated Problems and Proposed Resolutions**

BASF continues to be behind schedule. It will be necessary to revise the deliverable schedule to reflect current progress, USEPA's recent change in personnel, and timing of feedback from USEPA.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**



**TELEFAX**

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**DATE:** August 9, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 2510 0008 9246 1518**

July 9, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

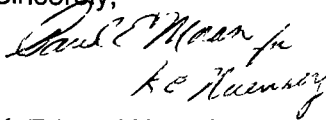
Subject: Monthly Progress Report Number 100  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 100 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2002. Please find attached the CMS Monthly Progress Report Number 49.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES100.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## CMS MONTHLY PROGRESS REPORT NO. 49

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	June 1 through June 30, 2002
<b>Date of Report:</b>	July 8, 2002

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Model calibration report finalized and delivered to EPA.
- Predictive simulation of one additional remediation scenario was carried out.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 95% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

Internal review of the predictive simulation required more time than anticipated due to scheduling conflicts among the project partners.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling, analytical or field activities were completed during this reporting period.

**1f. Groundwater Modeling Activities and Summary of Findings**

Groundwater modeling activities have focused on concluding the model calibration report and evaluating remediation scenarios using the calibrated model. Results from the remediation scenarios indicate that effective hydraulic control can be achieved.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

Two reports were completed during this reporting period: 1) the "Conceptual Hydrogeologic Model and Model Calibration Report", and 2) the "Field Investigation Report".

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

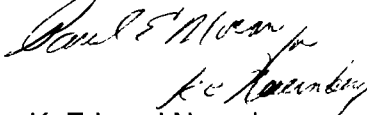
- A meeting with EPA will be scheduled to discuss the results to this point, and to address any EPA comments relating to modeling of remedial alternatives.

**3b. Anticipated Problems and Proposed Resolutions**

BASF is continuing to be behind schedule. It will probably be necessary to revise the deliverable schedule to reflect current progress.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF****TELEFAX**

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HARD COPY TO FOLLOW ☒**DATE:** July 8, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2083**

June 7, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

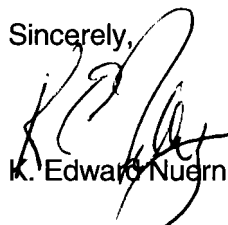
Subject: Monthly Progress Report Number 99  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 99 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2002. Please find attached the CMS Monthly Progress Report Number 48.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES99.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI



## **CMS MONTHLY PROGRESS REPORT NO. 48**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	May 1 through May 31, 2002
<b>Date of Report:</b>	June 6, 2002

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Internal review of the draft model calibration report continued.
- Predictive simulations of two remediation scenarios were carried out.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 75% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Issues discovered during the sensitivity analysis and report review necessitated additional calibration simulations, delaying project progress. Compounding this, internal review of the calibration report and of the predictive simulations required more time than anticipated due to scheduling conflicts among the project partners. The internal review of the calibration report has been concluded.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling, analytical or field activities were completed during this reporting period.

**1f. Groundwater Modeling Activities and Summary of Findings**

Groundwater modeling activities have focused on concluding the internal review of the model calibration report and evaluating remediation scenarios using the calibrated model. Preliminary results from the remediation scenarios indicate that effective hydraulic control can be achieved over most of the site.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- The Field Investigation Report will be completed.
- The model calibration report will be forwarded to EPA for review. A meeting with EPA will be scheduled to discuss the results to this point, and to address any EPA comments relating to modeling of remedial alternatives.
- Additional remediation scenarios will be modeled and evaluated. The goal is to achieve hydraulic control over the entire site.

**3b. Anticipated Problems and Proposed Resolutions**

It is anticipated that BASF will continue to be behind schedule. It maybe necessary to revise the deliverable schedule to reflect current progress.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**



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**DATE:** June 7, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2076**

May 10, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 98  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

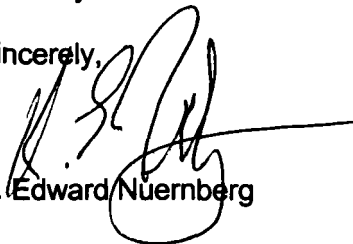
Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 98 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2002. Please find attached the CMS Monthly Progress Report Number 47.

There was a brief telephone conversation on April 18<sup>th</sup> between Mr. Juan Thomas and Mr. Bruce Roberts concerning draft corrective action objectives. Mr. Thomas mentioned an EPA groundwater guidance document that was available.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES98.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## **CMS MONTHLY PROGRESS REPORT NO. 47**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	April 1 through April 30, 2002
<b>Date of Report:</b>	May 9, 2002

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Waterloo Hydrogeologic finished model calibration to observed water levels, estimated boundary fluxes, and issued a draft model calibration report for internal review.
- The estimated percent completion of the CMS cannot be determined until BASF receives feedback from USEPA on the BASF-developed corrective action objectives.
- An estimated 70% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

There were no problems/issues were encountered.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling, analytical or field activities were completed during this reporting period. The results of the field investigation from February 2002 have been analyzed and are in the process of being documented. These results are incorporated in the numerical groundwater flow model.

**1f. Groundwater Modeling Activities and Summary of Findings**

Groundwater modeling activities have focused on calibration and sensitivity analysis. The calibration objective function included both observed average water levels and estimated boundary flux estimates from the February 2002 field work. Model calibration to observed heads is better than 10% of scaled RMS. Model calibration to flows is within 40% for the Fill and Native Sand units. The model calibration results were documented and internal review is underway.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- The Field Investigation Report will be completed.
- Internal review of the model calibration report will be completed.
- The model calibration report will be forwarded to EPA for review. A meeting with EPA will be held to discuss the results to this point, and to resolve any issues relating to modeling of remedial alternatives.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**



**TELEFAX**

- ☐ URGENT  
☐ REPLY NEEDED  
☐ FOR YOUR INFORMATION

NUMBER OF PAGES:   
(including cover sheet)  
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**DATE:** May 10, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2069**

April 10, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

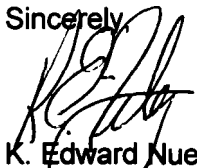
Subject: Monthly Progress Report Number 97  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 97 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2002. Please find attached the CMS Monthly Progress Report Number 46.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES97.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI



## **CMS MONTHLY PROGRESS REPORT NO. 46**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	March 1 through March 31, 2002
<b>Date of Report:</b>	April 9, 2002

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Waterloo Hydrogeologic continued work on model implementation, incorporating the new data obtained through the February field work.
- The estimated percent completion of the CMS can not be determined until BASF receives feedback from USEPA on the BASF developed corrective action objectives.
- An estimated 60% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

The survey of location and elevation of piezometers has required more time than initially anticipated, and due to some initial inaccuracies in the reporting, some of this work needed to be revised by the surveying contractor.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling, analytical or field activities were completed during this reporting period.

**1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities are focused on incorporating the field data and completing the model calibration. The model has been calibrated to previous observed water levels. Final calibration will include boundary flux estimates from the field work.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- The Field Program Report for the new piezometers will be completed.
- Model calibration, sensitivity analyses, and model verification will be completed.
- A modeling report, describing the background data, the model construction and calibration will be completed for internal review.
- BASF will submit draft Corrective Action objectives to USEPA for their consideration.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF****TELEFAX**

- ☐ URGENT  
☐ REPLY NEEDED  
☐ FOR YOUR INFORMATION

NUMBER OF PAGES:  
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4

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**DATE:** April 10, 2002

**TO:** Mr. Juan Thomas  
**Company/Dept.:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 1940 0001 4175 7300**

March 8, 2002

Mr. Juan Thomas  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

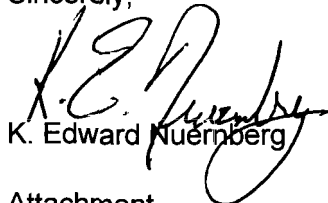
Subject: Monthly Progress Report Number 96  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Mr. Thomas:

BASF Corporation submits monthly Progress Report No. 96 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2002. Please find attached the CMS Monthly Progress Report Number 45.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES96.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## CMS MONTHLY PROGRESS REPORT NO. 45

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	February 1 through February 28, 2002
<b>Date of Report:</b>	March 8, 2002

---

### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Waterloo Hydrogeologic completed field work and continued work on model implementation.
- The estimated percent completion of the CMS can not be determined until BASF receives feedback from USEPA on the BASF developed corrective action objectives.
- An estimated 50% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

The installation of piezometers required one additional day due to weather conditions. The survey of location and elevation of piezometers has required more time than initially anticipated, but is proceeding smoothly.

### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

The Field Program to refine the water level information at the site boundaries was continued. A total of 37 piezometers were installed and water levels were measured in 110 measurement locations. New and selected existing monitoring well locations are in the process of being surveyed for location and elevation. No samples of soils or groundwater were collected for analysis.

### **1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities await the results from the surveyor. The model has been calibrated to water levels using PEST. Final calibration awaits the updated boundary flux estimates.

### **1g. Key Project Personnel Changes**

USEPA has changed its Project Manager; Mr. Juan Thomas is replacing Ms. Jacqueline Fisher.

## **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

## **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

### **3a. Anticipated Work**

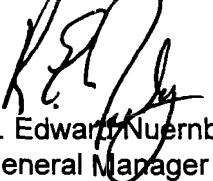
- The Field Program will be completed.
- The conceptual groundwater model report will be revised to include the results of the Field Program, and will be forwarded to EPA.
- Model calibration, sensitivity analyses, and model verification will be completed.

### **3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASE CORPORATION**

  
K. Edward Nuernberg  
General Manager

**BASF Corporation**

**BASF**

**K. Edward Nuernberg**  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7001 1940 0001 4175 7300**

**March 8, 2002**

**Mr. Juan Thomas**  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

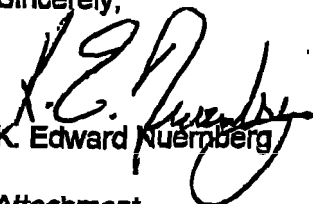
**Subject: Monthly Progress Report Number 96**  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

**Dear Mr. Thomas:**

BASF Corporation submits monthly Progress Report No. 96 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2002. Please find attached the CMS Monthly Progress Report Number 45.

Should you need additional information, please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES96.doc

**cc: BRoberts - BASF**  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

**MSutherland - PES**  
BVens - MDEQ Livonia  
PMartin - WHI

Confirmation Report - Memory Send

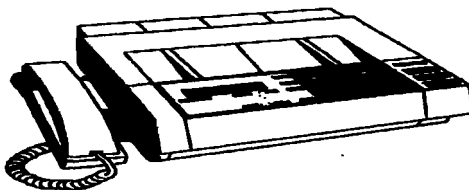
Page : 001  
Date & Time: Mar-07-02 08:13am  
Line 1 : +3123534342  
Machine ID : US EPA

Job number : 632  
Date : Mar-07 08:10am  
To : 917343246298  
Number of pages : 002  
Start time : Mar-07 08:10am  
End time : Mar-07 08:13am  
Pages sent : 002  
Status : OK

Job number : 632

\*\*\* SEND SUCCESSFUL \*\*\*

**Waste Pesticides & Toxics Division  
Enforcement & Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Mailcode: DRE-9J  
Chicago, Illinois 60604  
FACSIMILE REQUEST**



To: Bruce Roberts -BASF  
Office/Phone: \_\_\_\_\_  
Facsimile Number: 734-324-6298  
Verification Number: \_\_\_\_\_

From: Juan Thomas  
Office/Phone: 312-886-6010  
Date: 3-7-2002 Number of Pages: 2

**Additional Comments:**

Here is the missing letter. Julie informed me that she sent out 40 yrs in February. I will be sending out an amended version of this letter soon.  
**FACSIMILE NUMBER: 312/353-4342**  
Please call me should you have any questions.

Juan Thomas



BASF Corporation

**BASF****TELEFAX**

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☐ REPLY NEEDED  
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4

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DATE: 3-8-02

TO: MR. JUAN THOMAS  
Company/Dept.: USEPA  
Fax Number: (312) 353-4342  
Phone/Ext.:

FROM: BRUCE ROBERTS  
Dept./Location: WYANDOTTE  
Fax Number: (734) 324-6775  
Phone/Ext.:

Special Instructions:

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2052**

February 8, 2002

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

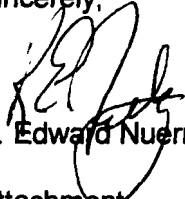
Subject: Monthly Progress Report Number 95  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 95 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2002. Please find attached the CMS Monthly Progress Report Number 44.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES95.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## **CMS MONTHLY PROGRESS REPORT NO. 44**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	January 1 through January 31, 2001
<b>Date of Report:</b>	February 8, 2002

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Waterloo Hydrogeologic continued work on model implementation.
- The estimated percent completion of the CMS can not be determined until BASF receives feedback from USEPA on the BASF developed corrective action objectives.
- An estimated 40% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

The City of Wyandotte's Chief Engineer was contacted regarding installation of a temporary piezometer on their property beside Biddle Avenue.

#### **1d. Problems/Issues Encountered and Resolutions**

There were no problems/issues encountered during this period.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

The Field Program to refine the water level information at the site boundaries was finalized and implementation begun. Data to be collected include stratigraphy and water levels at up to 31 new locations. Selected existing monitoring wells will be monitored to obtain current water levels. New and selected existing monitoring well locations will be surveyed for location and elevation. No samples of soils

**Monthly Progress Report  
8 February 2002**

or groundwater will be collected for analysis. Implementation of the Field Program will be completed in February, and results will be available at that time.

**1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities are focused on model calibration. Model calibration to observed water levels is partially completed, and preliminary evaluation of groundwater fluxes has begun. Infiltration modeling using the EPA HELP model was completed.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

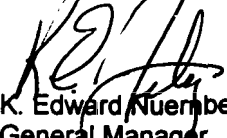
- The Field Program will be completed.
- A letter report summarizing the results of the Field Program will be completed.
- The conceptual groundwater model report will be revised to include the results of the Field Program, and will be forwarded to EPA.
- Model calibration and sensitivity analyses will continue.

**3b. Anticipated Problems and Proposed Resolutions**

A potential problem is not having an approved Final CMS Work Plan. It was anticipated that the work plan submitted to USEPA at the end of November would have been approved by USEPA in December. TASK VII, Subtask B in the November CMS Work Plan states that the "corrective action objectives that have been developed by BASF will be discussed with USEPA Region V prior to the submittal of the Draft CMS Report." Not having an approved work plan could impact when the Draft CMS Report is submitted to USEPA. ATTACHMENT III of the Consent Order states the "respondent, in conjunction with the U. S. EPA, shall establish site specific objectives for the corrective action needed to protect human health and the environment." It is not cost effective to have Waterloo Hydrogeologic Inc. model potential corrective measures scenarios until the site specific objectives have been established by BASF and USEPA. ATTACHMENT III of the Consent Order also states "it is not intended to select corrective measures that put financial hardships on the Respondent that impede implementation of corrective measures." BASF will contact USEPA concerning the status of the Final CMS Work Plan.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

report44 revised.doc

BASF Corporation

**BASF**



**TELEFAX**

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**DATE:** February 11, 2002

**TO:** Jacqueline Fisher  
**Company/Dept:** United States Environmental Protection Agency  
**Fax Number:** (312) 353-4788  
**Phone/Ext.:**

**FROM:** K. Edward Nuernberg  
**Dept./Location:** General Manager/Wyandotte  
**Fax Number:** (734) 324-6775  
**Phone/Ext.:** (734) 324-6161

**Special Instructions:**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2045**

January 7, 2002

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

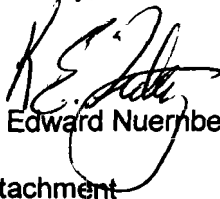
Subject: Monthly Progress Report Number 94  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 94 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2001. Please find attached the CMS Monthly Progress Report Number 43.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment  
i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES94.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## **CMS MONTHLY PROGRESS REPORT NO. 43**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	December 1 through December 31, 2001
<b>Date of Report:</b>	January 7, 2002

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Waterloo Hydrogeologic began work on model implementation.
- The estimated percent completion of the CMS, without modeling, at the end of this reporting period is 88 %.
- An estimated 35% of the groundwater modeling portion of the CMS is completed.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

The Wyandotte City Engineer was contacted concerning two city sewers that cross BASF property. Both sewers had been abandon prior to 1951.

#### **1d. Problems/Issues Encountered and Resolutions**

There were no problems/issues encountered during this period.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated. A Field Program to refine the water level information at the site boundaries is being finalized for implementation in January 2002.

## **1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities are focused on model implementation. The model grid, boundary conditions, conductivity zones, pumping wells and observation wells have been specified in a Visual MODFLOW model; MODFLOW 2000 is used as the numeric engine. Model calibration, convergence and stability are being evaluated. Infiltration modeling using the EPA HELP model is proceeding.

## **1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

## **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

## **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

### **3a. Anticipated Work**

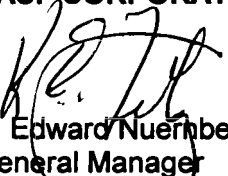
- The revised conceptual groundwater model report will be forwarded to EPA.
- Additional water level information to be gathered for use in groundwater modeling will be carried out.
- Model calibration and sensitivity analyses will continue.

### **3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2021**

December 10, 2001

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

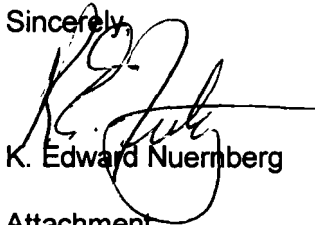
Subject: Monthly Progress Report Number 93  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 93 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2001. Please find attached the CMS Monthly Progress Report Number 42.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES93.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

**BASF Corporation**

**BASF**

**K. Edward Nuernberg**  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7000 0520 0015 4098 2021**

December 10, 2001

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

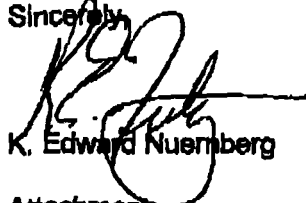
Subject: Monthly Progress Report Number 93  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 93 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2001. Please find attached the CMS Monthly Progress Report Number 42.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

(:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES93.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## **CMS MONTHLY PROGRESS REPORT NO. 42**

---

<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	November 1 through November 31, 2001
<b>Date of Report:</b>	December 10, 2001

---

### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Waterloo Hydrogeologic finalized work on the conceptual groundwater model.
- The estimated percent completion of the CMS can not be determined until BASF receives feedback from EPA on the BASF developed corrective action objectives.
- An estimated 20% of the groundwater modeling portion of the CMS is completed.
- On November 29<sup>th</sup> BASF submitted the final CMS Work Plan to EPA for their approval.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

Parsons ES was delayed several days in assembling the Final CMS Work Plan due to personnel being sick or not available.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated. A proposal for supplemental water level measurements and borehole drilling was forwarded by WHI to BASF.

**1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities are focused on model implementation. The internal review of the conceptual model is now essentially complete. Final edits are being made to the figures and the revised version will be forwarded to BASF, Parsons, and EPA.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables / reports were generated during this reporting period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- The revised conceptual groundwater model report will be forwarded to EPA.
- Additional water level information to be gathered for use in groundwater modeling will be scheduled.
- Model implementation (model construction / calibration) will continue.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**


  
K. Edward Nuernberg  
General Manager

Monthly Progress Report  
BASF Wyandotte North Works Facility  
November 7, 2001

Ms. Fisher will not be available to review the final conceptual Model Report until at least January 2002.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

Mid 064 197 742

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:**  
**7000 0520 0015 4098 2007**

October 8, 2001

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 91  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

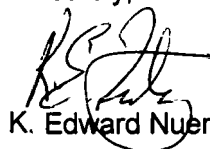
Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 91 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2001. Please find attached the CMS Monthly Progress Report No 40.

There was a telephone conversation on September 18<sup>th</sup> between Ms. Jacqueline Fisher and Bruce Roberts concerning BASF's CMS Work Plan that was submitted to EPA in March 2001. Ms. Fisher stated that she had not finished reviewing the plan yet, but did have some questions and they would be sent to BASF soon. Mr. Roberts stated that BASF expected to receive the Conceptual Model Report from Waterloo Hydrogeologic Inc. by the end of the month and that BASF wanted everyone to be in agreement with the report because future work is based upon the conceptual model.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES91.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI

## CMS MONTHLY PROGRESS REPORT NO. 40

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Reporting Period:</b>	September 1 through September 30, 2001
<b>Date of Report:</b>	October 4, 2001

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- Waterloo Hydrogeologic continued work on the conceptual groundwater model.
- Waterloo Hydrogeologic issued a Draft Conceptual Hydrogeologic Model Report.
- The estimated percent completion of the CMS, without modeling, at the end of this reporting period is 87 %.
- An estimated 15% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts with State Governments, local community representatives or Public Interest Groups occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

During this period, it was discovered that different vertical datums had been used in prior investigations, and the borehole logs were corrected to relate all records to the International Great Lakes Datum (IGLD) 1985. This datum is consistent with surface water elevations along the Detroit River.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

**1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities are focused on integrating the existing site data into a conceptual model, which is documented in the draft conceptual model report.

A four-layer site-scale conceptual model has been delineated. This will form the basis for the groundwater model development, which will be implemented using USGS MODFLOW. The model is to be calibrated to steady-state conditions and applied to evaluate alternative corrective measures.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

A Draft Conceptual Model Report was generated during this period for internal review.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- Waterloo Hydrogeologic will finalize the conceptual groundwater model with BASF and Parsons.
- Planning of additional water level information to be gathered for use in groundwater modeling will be finalized.
- The Conceptual Hydrogeologic Modeling Report will be finalized, forwarded to EPA, and a presentation meeting arranged.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1994**

September 7, 2001

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

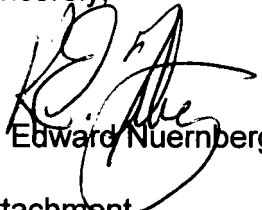
Subject: Monthly Progress Report Number 90  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 90 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2001. Please find attached the CMS Monthly Progress Report No 39.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES90.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia  
PMartin - WHI



RCRA Corrective Action  
Waste Management & Environmental  
U.S. EPA - REGION 5

## CMS MONTHLY PROGRESS REPORT NO. 39

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Waterloo Hydrogeologic Project Manager:</b>	Paul J. Martin
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	August 1 through August 31, 2001
<b>Date of Report:</b>	September 7, 2001

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF issued a purchase order to Waterloo Hydrogeologic Inc. for the groundwater modeling work.
- BASF forwarded a copy of the Consent Order to Waterloo Hydrogeologic Inc.
- BASF and Waterloo Hydrogeologic completed a Record Preservation Agreement.
- Waterloo Hydrogeologic received and is reviewing 39 documents relating to prior hydrogeologic investigations at the site.
- Waterloo Hydrogeologic began work on describing the conceptual groundwater model.
- The estimated percent completion of the CMS, without modeling, at the end of this reporting period is 87 percent.
- An estimated 2% of the groundwater modeling portion of the CMS is completed.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

WHI requested information on water well records in the vicinity of the site from Danyle L. Ordway of MDEQ. No contacts with local community representatives or Public Interest Groups occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No problems or issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

**1f. Groundwater Modeling Activities and Summary of Findings**

Current groundwater modeling activities are focused on the review of available information and determination of data gaps. This review will culminate in a conceptual groundwater modeling report to summarize the current knowledge of the groundwater flow system and the modeling approach to be applied.

**1g. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- Waterloo Hydrogeologic will continue working on the conceptual groundwater model.
- Planning of additional water level information to be gathered for use in groundwater modeling.
- A Conceptual Groundwater Modeling Report (CGMR) summarizing the current knowledge of the groundwater flow system and the modeling approach to be applied will be drafted and sent to BASF for review.
- BASF will send a copy of the CGMR to Parsons for review
- BASF and Parsons will begin their internal Review of the CGMR.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1987**

August 8, 2001

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 89  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

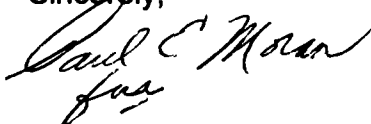
Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 89 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2001. Please find attached the CMS Monthly Progress Report No 38.

There was a telephone conversation on July 10<sup>th</sup> between Ms. Jacqueline Fisher and Bruce Roberts concerning any recent property transactions at Northworks. Mr. Roberts left telephone messages for Ms. Fisher stating that there had not been any.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES89.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia

## CMS MONTHLY PROGRESS REPORT NO. 38

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	July 1 through July 31, 2001
<b>Date of Report:</b>	August 7, 2001

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF selected the modeling specialist for the proposed modeling work.
- Parsons executed routine project management activities.
- The estimated percent completion of the CMS, without modeling, at the end of this reporting period is 87 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No problems or issues were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

RECEIVED  
WASTE, PESTICIDES & TOXICS DIVISION  
U.S. EPA—REGION 5

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will issue a purchase order for the groundwater modeling work.
- BASF will send a copy of the Consent Order to the modeling specialist.
- BASF will obtain a Record Preservation Agreement from the modeling specialist.
- The modeling specialist will begin working on the conceptual groundwater model.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASE CORPORATION**



K. Edward Nuernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0600 0028 2316 5709**

July 10, 2001

Ms. Jacqueline Fisher  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

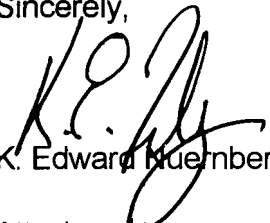
Subject: Monthly Progress Report Number 88  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Fisher:

BASF Corporation submits monthly Progress Report No. 88 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 2001. Please find attached the CMS Monthly Progress Report No 37.

Should you need additional information, please contact us at your convenience.

Sincerely,



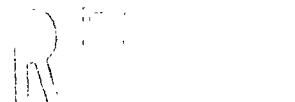
K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES88.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia



RCRA Corrective Action  
35th Pesticides & Toxics Division  
U.S. EPA - Region 5



## CMS MONTHLY PROGRESS REPORT NO. 37

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	June 1 through June 30, 2001
<b>Date of Report:</b>	July 10, 2001

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF conducted a pre-bid meeting on Tuesday June 5, 2001 for the specialists selected to bid on the proposed modeling work.
- BASF received quotations from the solicited modeling specialists on June 18, 2001.
- BASF commenced the process of reviewing and evaluating the quotations received from the selected modeling specialists.
- Parsons executed routine project management activities.
- The estimated percent completion of the CMS at the end of this reporting period is 87 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

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**1d. Problems/Issues Encountered and Resolutions**

No problems or issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


- BASF will select the modeling specialist and issue a purchase order for the groundwater modeling work.
- The modeling specialist will begin working on the conceptual groundwater model.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1970**

June 7, 2001

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

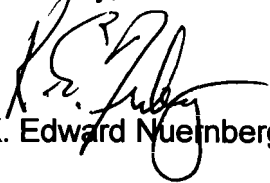
Subject: Monthly Progress Report Number 87  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 87 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2001. Please find attached the CMS Monthly Progress Report No 36.

Should you need additional information, please contact us at your convenience.

Sincerely,



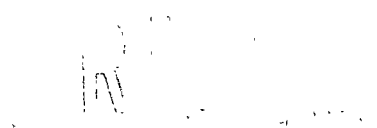
K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES87.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia



RCRA RECORDS & COMPLIANCE  
Pesticides & Toxic Division  
U.S. EPA - REGION 5

## **CMS MONTHLY PROGRESS REPORT NO. 36**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	May 1 through May 31, 2001
<b>Date of Report:</b>	June 6, 2001

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- BASF completed preparation of the Request for Quotation (RFQ) to facilitate the subcontracting of a modeling specialist to perform the proposed modeling work in support of the Correctives Measures Study (CMS) for the North Works Facility. The RFQ was sent out to the selected bidders on May 18, 2001.
- Parsons executed routine project management activities.
- The estimated percent completion of the CMS at the end of this reporting period is 87 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No problems or issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

- BASF will conduct a pre-bid meeting on Tuesday June 5, 2001 for the specialists selected to bid on the proposed modeling work.
- BASF will receive quotations from the solicited modeling specialists on or before June 18, 2001.
- BASF will commence the process of reviewing and evaluating the quotations received from the selected modeling specialists.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1963**

May 9, 2001

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

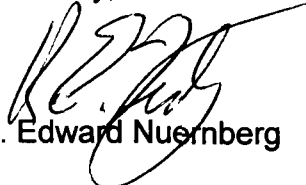
Subject: Monthly Progress Report Number 86  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 86 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2001. Please find attached the CMS Monthly Progress Report No 35.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES86.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia

RCRA 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## CMS MONTHLY PROGRESS REPORT NO. 35

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	April 1 through April 30, 2001
<b>Date of Report:</b>	May 9, 2001

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

During this reporting period, the following occurred:

- BASF commenced preparation of the Request for Quotation (RFQ) to subcontract a groundwater modeling specialist. The modeling specialist will perform the proposed modeling work to support the Correctives Measures Study (CMS) for the North Works Facility.
- Parsons executed routine project management activities.
- The estimated percent completion of the CMS at the end of this reporting period is 87 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No problems or issues were encountered during this period.

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U.S. EPA - REGION 5

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**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

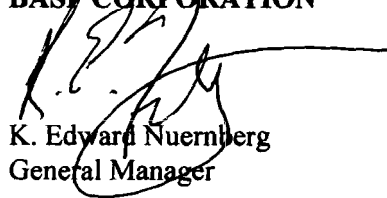
During the next reporting period, BASF plans to complete preparation of the RFQ and plans to send the RFQ to modeling specialists. Upon receipt of the proposals, BASF plans to select a qualified specialist to perform the modeling work. Parsons will provide technical support to BASF during this process.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1956**

April 9, 2001

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 85  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 85 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2001. Please find attached the CMS Monthly Progress Report No 34.

Should you need additional information, please contact us at your convenience.

Sincerely,

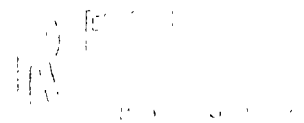
  
K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES85.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia



RCRA RECORDS ROOM  
Waste, Pollution & Toxic Division  
U.S. EPA - REGION 5

## **CMS MONTHLY PROGRESS REPORT NO. 34**

REGIONAL RECORDS ROOM  
Waste, Pesticides & Toxics Division  
U. S. EPA — REGION 5

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	March 1 through March 31, 2001
<b>Date of Report:</b>	April 9, 2001

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Parsons completed the preparation of the revised Draft CMS Work Plan and submitted the draft document to BASF on March 2, 2001, for review and comment.
- BASF reviewed the revised Draft CMS Work Plan and provided comments to Parsons on March 5, 2001.
- Parsons performed the revisions requested by BASF and submitted the revised CMS Work Plan to BASF on March 6, 2001, for final review and approval.
- On March 8, 2001, Parsons sent BASF the CMS Work Plan for submittal to the USEPA Region V. BASF sent out the document to the USEPA Region V on March 13, 2001, via overnight carrier service.
- On March 8, 2001, the BASF Project Coordinator, Mr. Bruce Roberts, contacted the USEPA Region V Project Manager, Ms. Jacqueline Nichele, via telephone and discussed BASF's proposed development and use of a calibrated groundwater model for the North Works Facility. In the March 13, 2001 transmittal letter that accompanied BASF's submittal of the CMS Work Plan to the USEPA Region V, Mr. Roberts documented BASF's intention to develop and use a calibrated groundwater model in the CMS alternatives assessment process.
- The estimated percent completion of the CMS, without alternatives assessment, at the end of this reporting period is 87 percent.

**1b. Summary of Changes Made to the CMS**

BASF discussed with USEPA Region V their intention to have a calibrated groundwater model developed for the North Works Facility, to assess various corrective measures alternatives for the CMS. The USEPA Region V did not object to this proposed addition/change to the CMS process.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

On March 13, 2001, the document entitled "*RCRA Corrective Measures Study Work Plan for the BASF North Works Facility, Wyandotte, Michigan*," dated March 2001, prepared by Parsons Engineering Science, Inc., was submitted by BASF to the USEPA Region V.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, it is anticipated that BASF will issue bids to have a modeling specialist to perform the proposed modeling work in support of the CMS. Parsons will provide technical support to BASF during this process, as necessary.

Monthly Progress Report  
BASF Wyandotte North Works Facility  
April 9, 2001

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

RCRA RECORDS SECTION  
Waste Reduction & Control Division  
U.S. EPA - REGION 5

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1949**

March 9, 2001

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 84  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

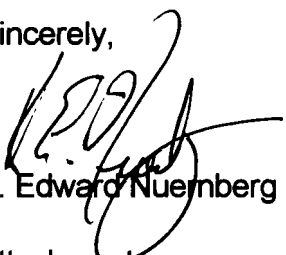
RCRA RECORDS NO. 1A  
Waste Postboxes & Forms (1/1/00)  
U.S. EPA—REGION 5

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 84 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2001. Please find attached the CMS Monthly Progress Report No 33.

Should you need additional information, please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES84.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia

## **CMS MONTHLY PROGRESS REPORT NO. 33**

USEPA REGION 5  
Hazardous & Toxic Division  
Hazardous Room

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	February 1 through February 28, 2001
<b>Date of Report:</b>	March 8, 2001

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

During this reporting period, the following occurred:

- Parsons completed the risk evaluation of the SWMU H area using the mass flux data and the RFI risk assessment algorithms.
- Parsons completed the preparation of the draft response to comments submittal on the CMS Field Program Report, and submitted the document to BASF for internal review and comment. BASF received the draft submittal on February 6, 2001.
- BASF reviewed the draft response to comments submittal on the CMS Field Program Report and provided comments to Parsons. All comments on the draft submittal were provided to Parsons (by BASF) on or before February 13, 2001.
- Parsons addressed BASF's comments on the draft response to comments submittal, and submitted the revised document to BASF for their receipt on February 19, 2001.
- BASF reviewed the revised response to comments submittal, coordinated with Parsons on final changes, and sent out the final document to the USEPA Region V on February 21, 2001, via overnight carrier service.
- Parsons commenced preparation of the revised Draft CMS Work Plan. The format of the document will be consistent with the direction provided by USEPA Region V during the January 22, 2001 conference call.

Monthly Progress Report  
BASF Wyandotte North Works Facility  
March 8, 2001

- BASF discussed with Parsons their comments on the Draft CMS Report submitted by Parsons in November 2000. (This report was originally entitled the Draft CMS Work Plan.)
- The estimated percent completion of the CMS at the end of this reporting period is 85 percent.

**1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

Following BASF's internal review of the Draft CMS Report (formerly entitled the Draft CMS Work Plan) that was submitted by Parsons in November 2000, BASF held internal discussions (during late January) on the direction and scope of the CMS. As a result of these discussions, BASF has decided to have a calibrated groundwater flow model developed for the Site. The modeling work will be performed by a Contractor that specializes in groundwater modeling. The model will evaluate different scenarios for effecting groundwater control at the Site. The output from the model will be used to assess the applicability of various corrective measure alternatives for the CMS. Based on the results of the model, Parsons will revise the Draft CMS Report. BASF will contact USEPA Region V during the next reporting period to discuss this proposed change in the CMS evaluation strategy.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

On February 21, 2001, the document entitled "*Response to USEPA Region V Comments on the RCRA Corrective Measures Study Field Program Report*," dated February 2001, prepared by Parsons Engineering Science, Inc., was submitted by BASF to the USEPA Region V.

### 3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD

REGIONAL RECORDS ROOM  
Waste, Pesticides & Toxics Division  
U.S. EPA—REGION 5

#### 3a. Anticipated Work

During the next reporting period, the following activities are anticipated to occur:

- Parsons will complete the preparation of the revised Draft CMS Work Plan. The format of the document will be consistent with the direction provided by USEPA in the January 22<sup>nd</sup> conference call.
- BASF will review the revised Draft CMS Work Plan and provide Parsons with comments.
- Parsons will address BASF's comments and submit the Draft CMS Work Plan document to BASF for approval.
- BASF will submit the CMS Work Plan to the USEPA Region V for review.
- BASF will discuss with USEPA Region V their proposed amendment to the strategy for the CMS, related to the development and use of a calibrated groundwater model for the Site.
- BASF will start to prepare a bid package for the modeling work.

#### 3b. Anticipated Problems and Proposed Resolutions

No problems are anticipated for the next reporting period.

This report was completed by:

BASF CORPORATION

  
K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1932**

February 9, 2001

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 83  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

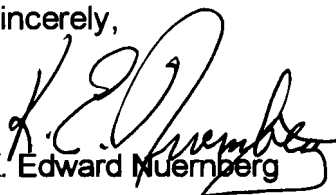
RECEIVED  
U.S. EPA - REGION 5

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 83 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2001. Please find attached the CMS Monthly Progress Report No 32.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES83.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

MSutherland - PES  
BVens - MDEQ Livonia

## **CMS MONTHLY PROGRESS REPORT NO. 32**

REGIONAL PUBLIC ROOM  
Waste, Pesticides & Toxics Division  
U.S. EPA—REGION 5

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	January 1 through January 31, 2001
<b>Date of Report:</b>	February 8, 2001

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- BASF reviewed the Technical Memorandum on the CMS slug testing program and provided comments to Parsons.
- BASF requested a conference call with the USEPA Region V to discuss USEPA's comments on the March 2000 CMS Field Program Report, which had been provided to BASF in correspondence dated October 26, 2000. The specific issues requiring discussion pertained to the evaluation and interpretation of the mass flux data for the SWMU H area emissions/risk. The conference call was convened on January 22, 2001. In attendance at the conference call were representatives from BASF, Parsons, and the USEPA Region V. It was decided during the conference call that Parsons would (1) take the mass flux data and process it through the algorithms used in the RFI risk assessment (prepared by QST Environmental) to assess the risk for the SWMU H area, and (2) prepare a response to comments document that provides an itemized response to USEPA's comments on the CMS Field Program Report. It was agreed that the draft response to comments submittal would be received by BASF (for internal review) on February 6, 2001. Parsons would receive BASF's comments on this submittal on or before February 13, 2001. Parsons committed to sending the final submittal to BASF for their receipt on February 19, 2001. This schedule assumed that BASF would not have extensive revisions to Parsons' draft submittal.

Also discussed during the conference call was the format of the CMS Work Plan. The USEPA Region V RCRA Project Manager, Ms. Jacqueline Nichele, acknowledged that the format for the CMS Work Plan, as presented in CMS Scope of Work (SOW) (Attachment III to the Administrative Order on Consent [AOC]) was confusing. Ms. Nichele clarified that the CMS Work Plan format could take the approach of simply outlining the task requirements presented in SOW.

Monthly Progress Report  
BASF Wyandotte North Works Facility  
February 8, 2001

- Parsons commenced preparation of the response to comments submittal associated with the CMS Field Program Report.
- Parsons commenced preparation of the risk evaluation of the SWMU area using the mass flux data and the RFI risk assessment algorithms.
- The estimated percent completion of the CMS at the end of this reporting period is 82 percent.

**1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No issues (above and beyond those discussed during the January 22<sup>nd</sup> conference call) were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated for submittal to the USEPA Region V during this period.

### **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

#### **3a. Anticipated Work**

During the next reporting period, the following activities are anticipated to occur:

- Parsons will complete the preparation of the draft response to comments submittal on the CMS Field Program Report and will submit the document to BASF for internal review and comment.
- BASF will review the draft response to comments submittal on the CMS Field Program Report and will provide comments to Parsons ES.
- Parsons will address BASF's comments on the response to comments submittal, and will submit the final document to BASF for subsequent distribution to the USEPA Region V.
- Parsons will commence preparation of the revised Draft CMS Work Plan. The format of the document will be consistent with the direction provided by USEPA in the January 22<sup>nd</sup> conference call.
- BASF will discuss with Parsons their comments on the original Draft CMS Work Plan submitted by Parsons in November 2000.

#### **3b. Anticipated Problems and Proposed Resolutions**

Depending on the outcome of discussions BASF will have internally and with Parsons during the next reporting period on the strategies for the CMS, BASF may need to have discussions with the USEPA Region V on the direction and associated schedule of the CMS.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

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U

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1925**

January 9, 2001

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

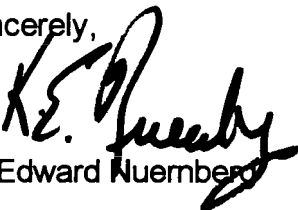
Subject: Monthly Progress Report Number 82  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 82 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 2000. Please find attached the CMS Monthly Progress Report No 31.

Should you need additional information, please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES82.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library  
JLanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia

## **CMS MONTHLY PROGRESS REPORT NO. 31**

RCRA/ EPCRA/ SDG  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	December 1 through December 31, 2000
<b>Date of Report:</b>	January 8, 2001

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- BASF reviewed the Draft CMS Work Plan submitted by Parsons ES and submitted comments to Parsons ES.
- Parsons ES completed the reduction and evaluation of the data from the "slug-out" testing program performed in November 2000. The slug test report was submitted to BASF for review in a Technical Memorandum dated December 18, 2000.
- The estimated percent completion of the CMS at the end of this reporting period is 81 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

The format of the CMS Work Plan, stipulated in Attachment III of the February 24, 1994 Administrative Order on Consent (Consent Order) entered in between BASF and the United States Environmental Protection Agency (USEPA) Region V for the Site, requires discussion with the USEPA Region V.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated for submittal to the USEPA Region V during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, the following activities are anticipated to occur:

- BASF will discuss comments on the Draft CMS Work Plan with Parsons ES.
- BASF will review the Technical Memorandum on the slug testing program and provide comments to Parsons ES.
- BASF will request a conference call with USEPA Region V to discuss USEPA's comments on the evaluation and interpretation of the mass flux data for the SWMU H area emissions/risk issue and to discuss the format of the CMS Work Plan.
- Parsons ES will commence preparation of the response to comments submittal associated with the CMS Field Program Report.

**3b. Anticipated Problems and Proposed Resolutions**

Agreement on the evaluation and interpretation of the mass flux data related to the SWMU H area emissions/risk issue is needed before the response to comments submittal for the CMS Field Program Report can be completed. Also, a resolution on the format of the CMS Work Plan is needed before that plan can be finalized for submittal to the USEPA Region V.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Bruce Roberts, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** November 1 through November 30, 2000

**Date of Report:** December 7, 2000

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## **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- On November 16, 2000, the USEPA Region V Project Manager, Ms. Jacqueline Nichele visited the BASF North Works Facility. Ms. Nichele, BASF representatives Messrs. Bruce Roberts and Jack Lanigan, and the Parsons ES Project Manager Ms. Mona Sutherland, participated in a walk-through of the facility. After the walk-through, all parties met and discussed the USEPA Region V comments on the CMS Field Program Report. The comments centered primarily on the slug tests performed during the CMS field program and on the procedures and results associated with the mass flux assessment of the SWMU H area. It was agreed that BASF's response to these comments should be submitted to the USEPA Region V after (1) Parsons ES has re-performed "slug-out" tests at specific onsite wells and completed the reduction and evaluation of the generated additional slug test data, and (2) all parties agree on what additional assessment of the mass flux data would be necessary to address the SWMU H area emissions/risk issue. A tentative schedule of the second or third week in January 2001 was identified for BASF to submit the response to comments to the USEPA Region V.
- Parsons ES completed the preparation of the Draft CMS Work Plan. On November 27, 2000, the Draft CMS Work Plan was submitted to BASF for review and comment.
- The estimated percent completion of the CMS at the end of this reporting period is 80 percent.

### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

### **1d. Problems/Issues Encountered and Resolutions**

USEPA Region V commented on the "slug-in" tests performed by Parsons ES at certain onsite wells during the 1999 CMS field program. Parsons ES agreed to re-perform the slug tests at the wells in questions, using the "slug-out" testing procedure.



**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

During the period of November 21 and 22, 2000, Parsons ES performed "slug out" tests at seven onsite monitoring wells, to replace the hydraulic conductivity data generated from "slug-in" tests that were performed at these wells during the 1999 CMS field program.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated for submittal to the USEPA Region V during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, the following activities are anticipated to occur:

- BASF will review the Draft CMS Work Plan submitted by Parsons ES.
- Parsons ES and BASF will discuss BASF's comments on the Draft CMS Work Plan.
- Parsons ES will complete the reduction and evaluation of the data from the "slug-out" testing program performed in November 2000. The slug test data will be submitted to BASF for review.
- Parsons ES will commence preparation of the response to comments associated with the CMS Field Program Report.

**3b. Anticipated Problems and Proposed Resolutions**

BASF and Parsons ES will need to have further discussions with the USEPA Region V on the evaluation and interpretation of the mass flux data related to the SWMU H area emissions/risk issue, before the response to comments submittal for the CMS Field Program Report can be completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098**

December 8, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 81  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 81 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 2000. Please find attached the CMS Monthly Progress Report No 30.

Should you need additional information, please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES81.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library  
JLanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 1901**

November 9, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 80  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

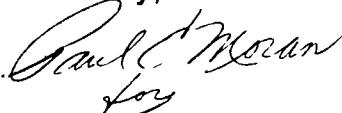
Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 80 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 2000. Please find attached the CMS Monthly Progress Report No 29.

On October 30<sup>th</sup> BASF received comments dated October 26<sup>th</sup> from US EPA concerning the March 2000 Corrective Measures Study Field Program Report.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES80.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library  
JLanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia

RECEIVED  
U.S. EPA - REGION 5

## CMS MONTHLY PROGRESS REPORT NO. 29

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	October 1 through October 31, 2000
<b>Date of Report:</b>	November 8, 2000

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES continued the preparation of the Draft CMS Work Plan.
- In a letter to BASF, dated October 26, 2000, the USEPA Region V submitted comments to BASF on the CMS Field Program Report, dated March 2000, prepared by Parsons ES.
- The estimated percent completion of the CMS at the end of this reporting period is 77 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No issues were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

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**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, the following activities are anticipated to occur:

- Parsons ES and BASF will discuss the USEPA Region V comments on the CMS Field Program Report.
- On November 16, 2000, BASF and Parsons ES will participate with the USEPA Region V in a walk-through of the BASF Wyandotte North Works Facility.
- On or before November 17, 2000, Parsons ES will submit the Draft CMS Work Plan to BASF for review.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4099 3058**

October 9, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 79  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

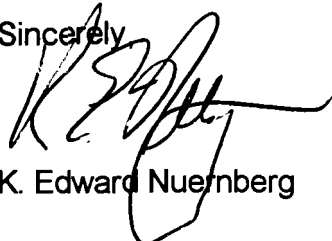
Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 79 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 2000. Please find attached the CMS Monthly Progress Report No 28.

This letter also serves as formal notification that BASF Corporation will change Project Coordinators for the RCRA Corrective Action project. Effective November 1, 2000, Mr. Bruce Roberts will replace Mr. Jack Lanigan as Project Coordinator. Mr. Roberts can be reached at (734) 324-6298, and his mailing address is here at the Wyandotte, North Works.

Should you need additional information, please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES79.doc

cc: BRoberts - BASF  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library  
JLanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia

## CMS MONTHLY PROGRESS REPORT NO. 28

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<b>Project:</b>	Corrective Measures Study BASF Corporation North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	September 1 through September 30, 2000
<b>Date of Report:</b>	October 9, 2000

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES continued preparation of the Draft CMS Work Plan. Work associated with preparation of the Work Plan included groundwater modeling, assessment of groundwater treatment alternatives, development of groundwater treatment processes, and evaluation of barrier containment options.
- On September 18, 2000, Ms. Jacqueline Nichele notified BASF that the EPA's review comments on the CMS Field Report would be delayed. BASF should expect to receive comments in early October 2000. Additionally, Ms. Nichele stated that she wishes to schedule a visit to the Wyandotte site for late October or early November.
- The estimated percent completion of the CMS at the end of this reporting period is 62 percent.

#### 1b. Summary of Changes Made to the CMS

We did not make or request any changes to the CMS during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

We did not make any contacts with local groups during this period.

#### 1d. Problems/Issues Encountered and Resolutions

We did not encounter any problems during this period.

RCRA RECORDS ROOM  
EAST PITTSBURGH DISTRICT OFFICE  
U.S. EPA - REGION 5

W:\733893R\monthlyrpt\000907\msbasf-cm27

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Sampling or field activities related to the CMS scope of work did not occur during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Effective November 1, 2000, Mr. Bruce Roberts will replace Mr. Jack Lanigan as BASF's Project Coordinator. Mr. Roberts was the Project Coordinator from October 1994 through November 1998. Mr. Lanigan will continue to be involved with the project.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period:

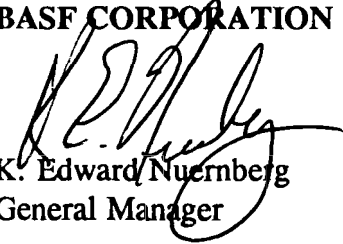
- ♣ Parsons ES will continue assessing remedial alternatives for the CMS Report.
- ♣ Parsons ES anticipates presenting the draft CMS Work Plan to BASF for review.
- ♣ BASF anticipates receiving comments from EPA on the CMS Field Program Report and on the proposed alternatives for the CMS.
- ♣ BASF will prepare responses to the EPA's comments, as appropriate.

**3b. Anticipated Problems and Proposed Resolutions**

We do not anticipate any problems during the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4099 3034**

September 8, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

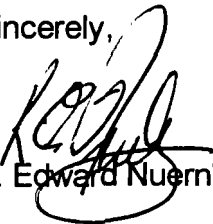
Subject: Monthly Progress Report Number 78  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 78 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 2000. Please find attached the CMS Monthly Progress Report No 27.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES78.doc

RECEIVED  
SEP 11 2000  
U.S. EPA - REGION V

cc: J Lanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 27

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**Project:** Corrective Measures Study  
BASF Corporation  
North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** August 1 through August 31, 2000

**Date of Report:** September 8, 2000

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES continued acquiring information and data to facilitate screening remedial technologies and alternatives for the CMS Work Plan and CMS Report.
- The estimated percent completion of the CMS at the end of this reporting period is 56 percent.

#### 1b. Summary of Changes Made to the CMS

We did not make or request any changes to the CMS during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

We did not make any contacts with local groups during this period.

#### 1d. Problems/Issues Encountered and Resolutions

We did not encounter any problems during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

Sampling or field activities related to the CMS scope of work did not occur during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Key personnel for this project remain the same.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period:

- ♣ Parsons ES will continue the remedial alternatives assessment process for the CMS Report.
- ♣ Parsons ES will complete the CMS Work Plan,
- ♣ BASF anticipates receiving comments from EPA on the CMS Field Program Report and on the proposed alternatives for the CMS.
- ♣ BASF will prepare responses to the comments as appropriate.

**3b. Anticipated Problems and Proposed Resolutions**

We do not anticipate any problems during the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED:  
7000 0520 0015 4098 2090**

August 8, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 77  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 77 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 2000. Please find attached the CMS Monthly Progress Report No 26.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES77.doc

cc: J Lanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia  
RVitale - Environmental Standards

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra  
BWallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 26

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	July 1 through July 31, 2000
<b>Date of Report:</b>	August 8, 2000

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- During a telephone discussion on July 13, 2000, between BASF and the USEPA Region V Project Manager, Ms. Jacqueline Nichele, the parties agreed to proceed with the CMS report preparation as outlined by BASF in a letter to USEPA dated June 21, 2000. Ms. Nichele stated that the June 21, 2000, letter appeared straight forward, and BASF could proceed with the screening of remedial alternatives and the evaluation process as outlined. Ms. Nichele also stated that the USEPA Region V was continuing their review of the CMS Field Program Report, and they anticipated completing their review within six weeks.
- The estimated percent completion of the CMS at the end of this reporting period is 56 percent.

#### 1b. Summary of Changes Made to the CMS

WE did not make or request any changes to the CMS during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

We did not make any contacts with local groups during this period.

#### 1d. Problems/Issues Encountered and Resolutions

We did not encounter any problems during this period.

RECEIVED JUL 27 11 00 AM  
WASTE RESTORATION & TOXIC DIVISION  
U.S. EPA - REGION 5

W:\733893R\monthlyrpt\000807\msbasf-cm26

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Sampling or field activities related to the CMS scope of work did not occur during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Key personnel for this project remain the same.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

The following activities are currently anticipated to occur during the next reporting period:

- Parsons ES will proceed with the assessment of remedial alternatives for the CMS Report.
- BASF will receive comments from the USEPA Region V on the CMS Field Program Report.

**3b. Anticipated Problems and Proposed Resolutions**

We do not anticipate any problems during the next reporting period.

This report was completed by:

**BASF CORPORATION**

K. Edward Nuernberg  
General Manager

# BASF

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED: Z263 958 130**

**1609 Biddle Avenue, Wyandotte, Michigan 48192 (734) 324-6000**

## **CMS MONTHLY PROGRESS REPORT NO. 25**

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**Project:** Corrective Measures Study  
for the BASF Corporation  
North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** June 1 through June 30, 2000

**Date of Report:** July 12, 2000

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- In a letter dated June 21, 2000, BASF provided the USEPA Region V with an overview of the proposed remedial alternatives that will be assessed for the BASF Corporation's North Works property in Wyandotte. These alternatives will be presented and discussed in the CMS Report.
- In the June 21<sup>st</sup> letter, BASF requested a meeting with the USEPA Region V to discuss our approach and to ensure there is consensus on the approach, on the corrective action objectives, and on compliance monitoring requirements.
- The estimated percent completion of the CMS at the end of this reporting period is 56 percent.

#### **1b. Summary of Changes Made to the CMS**

We did not make or request any changes to the CMS during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

We did not make any contacts with local groups during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

We did not encounter any problems during this period.



**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Sampling or field activities related to the CMS scope of work did not occur during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Key personnel for this project remain the same.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

BASF Corporation, with Parsons ES, prepared a letter summarizing the focused corrective measure alternatives we propose to pursue during the CMS. We presented the letter to the EPA on June 21, 2000.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

The following activities are currently anticipated to occur during the next reporting period:

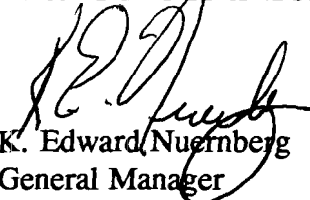
- We will schedule a meeting among the EPA Region V, BASF, and Parsons ES to discuss the approach to the CMS alternatives and to the corrective action objectives.
- BASF anticipates receiving a letter from the EPA that discusses their perception of the CMS Field Program Report that BASF presented to the EPA during March 2000.
- Parsons ES will commence the assessment of remedial alternatives for the CMS.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 058 363 563**

June 9, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 75  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 75 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 2000. Please find attached the CMS Monthly Progress Report No 24.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES75.doc

cc: J Lanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia  
RVitale - Environmental Standards

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra  
BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 24**

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	May 1 through May 31, 2000
<b>Date of Report:</b>	June 9, 2000

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- BASF and Parsons ES met on May 8, 2000, and discussed our approach to CMS and the assessment of remedial alternatives. The approach integrates the findings from both the CMS Field Program and the RFI results.
- BASF and Parsons ES are pursuing a focused evaluation of alternatives in the CMS targeting groundwater at the perimeter of the North Works property as the key component of the strategy.
- Parsons ES began drafting a letter with BASF to present our proposed corrective measure alternatives to the EPA.
- The estimated percent completion of the CMS at the end of this reporting period is 55 percent.

#### **1b. Summary of Changes Made to the CMS**

We did not make or request any changes to the CMS during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

We did not make any contacts with local groups during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

We did not encounter any problems during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Sampling or field activities related to the CMS scope of work did not occur during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Key personnel for this project remain the same.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

The following activities are currently anticipated to occur during the next reporting period:

- BASF will submit a letter to the EPA Region V summarizing the focused corrective measure alternatives. assessment approach that has been developed by BASF and Parsons ES for the CMS.
- BASF will request a meeting with the EPA Region V to discuss both the approach to the CMS Report and the corrective action objectives.
- BASF anticipates receiving a letter from the EPA that discusses their perception of the CMS Field Program Report presented during March 2000.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
R. Edwards  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 562

May 8, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

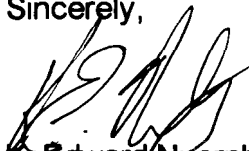
Subject: Monthly Progress Report Number 74  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 74 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 2000. Please find attached the CMS Monthly Progress Report No 23.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES74.doc

cc: J Lanigan - BASF  
MSutherland - PES  
BVens - MDEQ Livonia  
RVitale - Environmental Standards

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra  
BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 23**

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**Project:** Corrective Measures Study  
for BASF Corporation, North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** April 1 through April 30, 2000

**Date of Report:** May 8, 2000

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons ES commenced discussions with BASF on the CMS report.
- A meeting between BASF and Parsons ES is scheduled for May 8, 2000, to discuss how the findings from the CMS Field Program in conjunction with the RFI data impact the direction of the CMS and the assessment of remedial alternatives.
- On April 11, 2000, the EPA Project Manager, Ms. Jacqueline Nichele, and the BASF Project Coordinator, Mr. Jack Lanigan, met in Chicago and discussed the progress on this project and the overall approach to performing the CMS during 2000.
- The estimated percent completion of the CMS at the end of this reporting period is 53 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

We did not encounter any problems during this period.

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STATE, REGIONAL, AND LOCAL  
U.S. EPA - REGION 5

W:\733893R\monthlyrpt\000506\msbasf-cm23

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Sampling or field activities related to the CMS scope of work did not occur during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Key personnel for this project remain the same.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period. BASF presented the CMS Field Program Report to the EPA on March 21, 2000.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

The following activities are currently anticipated to occur during the next reporting period:

- Parsons ES and BASF will meet on May 8, 2000 to assess remedial alternatives and discuss the approach for the CMS Report.
- BASF will request a meeting with the USEPA Region V to discuss the approach that will be taken for the CMS Report.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 058 363 561**

April 10, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 73  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 73 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 2000. Please find attached the CMS Monthly Progress Report No 22.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachment**

i:\ecology\Jack Lanigan\EPA Progress Reports\PRGRES73.doc

cc: J Lanigan - BASF  
M Sutherland - PES  
B Vens - MDEQ Livonia  
R Vitale - Environmental Standards

R Blayer - MDEQ Lansing  
L Aubuchon - MDEQ Livonia  
A Danford - Quanterra  
B Wallace - Bacon Memorial Public Library



## CMS MONTHLY PROGRESS REPORT NO. 22

<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	March 1 through March 31, 2000
<b>Date of Report:</b>	April 7, 2000

## 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- BASF reviewed the revised CMS Field Program Report and provided final comments to Parsons ES.
- Parsons ES addressed BASF's final comments and incorporated the comments into the CMS Field Program Report. Parsons ES delivered the CMS Field Program Report to the EPA.
- The estimated percent completion of the CMS at the end of this reporting period is 52 percent.

### 1b. Summary of Changes Made to the CMS

**No changes to the CMS were requested during this period.**

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

BASF contacted the Michigan Department of Environmental Quality and confirmed that Ms. Beth Vens will receive future correspondence and reports pertaining to this project instead of Mr. Jon Russell.

#### 1d. Problems/Issues Encountered and Resolutions

**We did not encounter any problems during this period.**

U.S. EPA - REGION 5

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**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Sampling or field activities related to the CMS scope of work did not occurred during this period; therefore, analytical data were not generated.

**1f. Key Project Personnel Changes**

Key personnel for this project remained the same.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The CMS Field Program Report was delivered to the USEPA Region V and the Michigan DEQ on March 21, 2000.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

The following activities are anticipated to occur during the next reporting period:

- Parsons ES and BASF will continue working on CMS Work Plan Task VII - *Identification and Development of the Corrective Measures Alternatives* - as presented in the Administrative Order on Consent, Attachment III.
- Parsons ES and BASF will meet to assess remedial alternatives and discuss the approach for the CMS Report.
- BASF will request a meeting with the USEPA Region V to discuss the approach for the CMS Report.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 058 363 560**

March 9, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 72  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

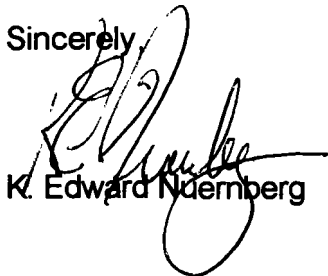
RECEIVED  
U.S. EPA - REGION V  
CHICAGO, ILLINOIS

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 72 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 2000. Please find attached the CMS Monthly Progress Report No 21.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

I:\ecology\jack\EPA Progress Reports\PRGRES72.doc

cc: J Lanigan - BASF	R Blayer - MDEQ Lansing
MSutherland - PES	LAubuchon - MDEQ Livonia
BVens - MDEQ Livonia	ADanford - Quanterra
RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 21**

RECORDS ROOM  
Hazardous Waste Remediation Division  
U.S. EPA—REGION 5

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Property 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	February 1 through February 29, 2000
<b>Date of Report:</b>	March 8, 2000

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons ES completed the revisions to the CMS Field Program Report in response to BASF's comments. The revised report was submitted to BASF on February 23, 2000 for approval.
- The estimated percent completion of the CMS at the end of this reporting period is 45 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

#### **1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

## **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been completed during this period.

## **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

### **3a. Anticipated Work**

The following activities are currently anticipated to occur during the next reporting period:

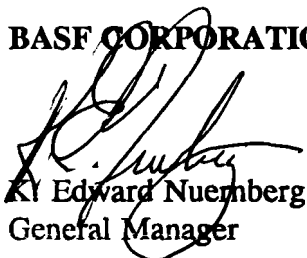
- Following BASF's approval, the CMS Field Program Report will be presented to USEPA Region V and to the Michigan Department of Environmental Quality (MDEQ). Presentation of the report to USEPA and MDEQ is anticipated to occur on or before March 31, 2000.
- Parsons ES and BASF will meet to assess remedial alternatives and discuss the approach for the CMS report.
- BASF will discuss the approach for the CMS Report with the USEPA Region V.

### **3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

U.S. Environmental Protection Agency  
Office of Water  
U.S. EPA - REGION 5

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 058 363 558**

February 8, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

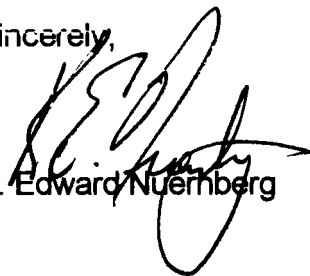
Subject: Monthly Progress Report Number 71  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 71 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 2000. Please find attached the CMS Monthly Progress Report No 20.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\jack\EPA Progress Reports\PRGRES71.doc

cc: J Lanigan - BASF  
MSutherland - PES  
JRussell - MDEQ Livonia  
RVitale - Environmental Standards

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra  
BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 20**

RECORDS ROOM  
WATER & TOXICS Division  
EPA - REGION 5

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	January 1 through January 31, 2000
<b>Date of Report:</b>	February 8, 2000

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- BASF reviewed the Draft CMS Field Program Report and provided comments to Parsons ES.
- Parsons ES commenced revisions to the CMS Field Program Report in response to BASF comments.
- The estimated percent completion of the CMS at the end of this reporting period is 39 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No problems or issues were encountered during this period.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, no analytical data were generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

The CMS Field Program Report continues in preparation. BASF generated and presented the December 1999 monthly report on January 7, 2000.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During February, Parsons ES will complete the CMS Field Program Report and will submit the revised report to BASF for final approval.

Following BASF's approval, the CMS Field Program Report will be submitted to USEPA Region V and to the Michigan Department of Environmental Quality. BASF anticipates presenting the Report to the USEPA and the MDEQ on or before February 29, 2000.

As the Field Program Report is completed, Parsons ES and BASF will continue working on CMS Work Plan Task VII - *Identification and Development of the Corrective Measures Alternatives* -- as presented in the Administrative Order on Consent, Attachment III.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



## **CMS MONTHLY PROGRESS REPORT NO. 19**

U.S. ENVIRONMENTAL  
PROTECTION AGENCY  
WASHINGTON, D.C. 20460  
EPA-823-R-99-015

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	December 1 through December 31, 1999
<b>Date of Report:</b>	January 7, 2000

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons ES completed the evaluation and tabulation of the analytical data from the CMS field program.
- Parsons completed preparation of the Draft CMS Field Program Report and submitted one copy to BASF on December 21<sup>st</sup> for review and comment.
- The estimated percent completion of the CMS at the end of this reporting period is 38 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

BASF Corporation received formal notice from EPA that Ms. Jacqueline Nichele will be the new project manager for EPA. BASF wishes to thank Ms. Diane Sharrow for her accomplishments on this project. We also wish her the best of luck on her next assignment.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, BASF will complete review of the CMS Field Program Report and provide comments and directions to Parsons ES. Parsons ES will consider and address BASF's comment on the CMS Field Program Report and will submit the revised report to BASF for final approval.

Following BASF's approval, the CMS Field Program Report will be submitted to USEPA Region and to the Michigan Department of Environmental Quality (MDEQ) for review and comment. Submittal of the Report to USEPA and MDEQ is anticipated to occur during mid-February 2000.

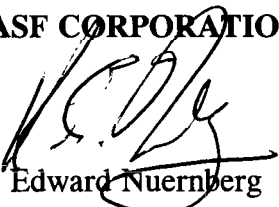
As the Field Program Report is completed, Parsons ES and BASF will continue working on CMS Work Plan Task VII - *Identification and Development of the Corrective Measures Alternatives* -- as presented in the Administrative Order on Consent, Attachment III.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 554

January 7, 2000

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 70  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

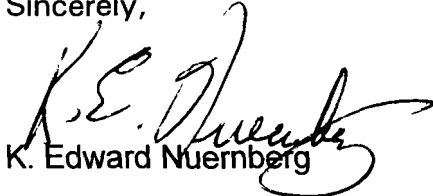
Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 70 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 1999. Please find attached the CMS Monthly Progress Report No 19.

As you may recall from last month's report, BASF discontinued the land-reclamation project at AOC 4; and we no longer will submit separate reports for that effort.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachment**

i:\ecology\jack\EPA Progress Reports\PRGRES70.doc

cc: J Lanigan - BASF	R Blayer - MDEQ Lansing
MSutherland - PES	LAubuchon - MDEQ Livonia
J Russell - MDEQ Livonia	ADanford - Quanterra
RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 18

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**Project:** Corrective Measures Study  
for the BASF Corporation, North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** November 1 through November 30, 1999

**Date of Report:** December 6, 1999

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES completed the preparation of the boring logs associated with the CMS field program and continued working on the hydrogeological aspects of the CMS Field Program Report.
- Environmental Standards, Inc. completed data validation activities and submitted the validation report and the updated electronic data deliverable (EDD) to BASF and Parsons ES during the week of November 15, 1999.
- Parsons ES commenced the evaluation and tabulation of the analytical data from the CMS field program. The analytical data along with the findings from the pump test, slug test, groundwater field screening, and the geophysical investigation will be compiled to assess whether the issues identified in the CMS Work Plan (such as potential chemical migration along site boundaries and chemical volatilization in the vicinity of SWMU H/AOC 5) have been addressed.
- BASF personnel presented a synopsis of the RCRA Corrective Action project to the new EPA Project Manager, Ms. Jacqueline Nichele, during a meeting in Chicago on November 23, 1999. In addition to summarizing the history of the North Works site and the progress on the RCRA Corrective Action, BASF presented a preliminary schedule for completing the CMS and progressing to implementation.
- The estimated percent completion of the CMS at the end of this reporting period is 34 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

BASF personnel presented last month's Progress Reports to the Wyandotte Community Advisory Panel during a meeting on 4 November 1999.

**1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

BASF understands that EPA assigned a new Project Manager to this project. Ms. Jacqueline Nichele will replace Ms. Diane Sharrow. BASF anticipates receiving formal notification soon. No other key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, Parsons ES will continue working on the Draft CMS Field Program Report. Currently, Parsons anticipates delivering the Draft CMS Report to BASF on 15 December 1999 for BASF internal review and comment. The CMS Field Program Report will: (1) describe the field activities performed during the CMS field program and the associated field observations, (2) present the field and analytical data generated from the program, and (3) discuss the interpretation and implications of the data. In the CMS Field Program Report there will also be preliminary discussion of the various alternatives that Parsons ES proposes to assess as part of the CMS.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## AOC 4 RECLAMATION REPORT NO. 20

### BASF CORPORATION WYANDOTTE, MICHIGAN

**Reporting Period: November 1 Through November 30, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

In summary, BASF Corporation's project team suspended work on this land-reclamation project during November. BASF believes the estimated costs to reclaim this piece of land far out weigh the beneficial re-use of the land.

All investigative reports prepared for AOC 4 were presented to the EPA previously. Therefore, BASF does not propose incorporating those findings into the CMS Field Investigation Report or changing the delivery schedule.

The CMS Field Investigation Report, currently in preparation, focuses on perimeter areas of the North Works property. As such, excluding AOC 4 from that report is not anticipated to impact the overall project objective. The AOC 4 will be evaluated in the CMS (likely for isolation or containment options) beginning early next year.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- BASF Corporation did not perform activities on this land reclamation project during November.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF will continue to weigh strategies and to discuss alternatives with consultants, contractors, and EPA as they pertain to the CMS.
- This is the final AOC 4 Reclamation Report.

This report was completed by:

**BASF Corporation**

  
K. Edward Nuernberg  
General Manager

**RECEIVED**

001 2 9 2001

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 552

December 6, 1999

Ms. Jacqueline Nichele  
Project Manager  
United States Environmental Protection Agency  
Region V, (DE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

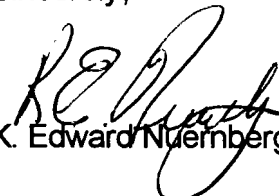
Subject: Monthly Progress Report Number 69  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Nichele:

BASF Corporation submits monthly Progress Report No. 69 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 20 for the land reclamation project and the CMS Monthly Progress Report No 18.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachments**

i:\ecology\jack\IEPA Progress Reports\PRGRES69.doc

cc: J Lanigan - BASF  
MSutherland - PES  
JRussell - MDEQ Livonia  
RVitale - Environmental Standards

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra  
BWallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 17

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**Project:** Corrective Measures Study  
for the BASF Corporation, North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** October 1 through October 31, 1999

**Date of Report:** November 9, 1999

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES completed evaluations of the aquifer pump test and slug test data collected during the CMS field program.
- Quanterra completed laboratory analyses of the samples collected during the CMS field program. All data were sent to Environmental Standards, Inc. to be validated.
- Environmental Standards, Inc. continued validation activities on the data generated by Quanterra.
- The estimated percent completion of the CMS at the end of this reporting period is 33 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No issues were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no new analytical data were generated.



**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period:

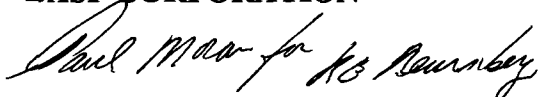
- We anticipate Environmental Standards, Inc. should complete data validation activities during November. When complete, they will present the validated data and the validation reports to BASF and to Parsons ES.
- Parsons ES will prepare the CMS Field Program Report for BASF. Preparation of the report is in progress. Sections describing the hydrogeology, aquifer test results, and groundwater flow paths are progressing. Inclusion of the analytical results, descriptions of potential chemical migration, and discussions of volatilization and the air-migration pathway will commence following Parson's receipt of validated data.
- With anticipated progress on the CMS Field Report, we anticipate beginning work on the CMS Work Plan Task VII – *Identification and Development of the Corrective Measures Alternatives*.
- BASF is attempting to schedule a meeting with the EPA's Project Manager for this Corrective Action assignment. The purpose of the meeting will be to brief the new PM on the history, progress, plans, schedule, and technical objectives for the CMS.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

## AOC 4 RECLAMATION REPORT NO. 19

### BASF CORPORATION WYANDOTTE, MICHIGAN

**Reporting Period: October 1 Through October 31, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

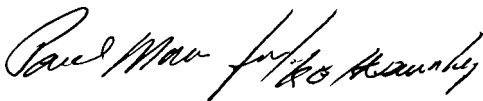
- BASF Corporation's project team reviewed draft plans, options, and estimated costs to remove the tarry materials from the ground, treat the materials, and have the materials accepted for recycling or disposal.
- At this stage, BASF believes the costs to reclaim this piece of land far out weigh the beneficial re-use of the land.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF will continue to weigh alternative strategies and to discuss the alternatives with our consultants and contractors.
- We currently believe the land reclamation project will be terminated, and AOC 4 will be returned to the mainstream CMS where containment and isolation alternatives will be evaluated.
- BASF will discuss this option with EPA later this month. Regardless, BASF will continue to provide EPA with the anticipated schedule and project objectives.

This report was completed by:

**BASF Corporation**



**K. Edward Nuernberg  
General Manager**

10/29/99  
AOC 4 RECLAMATION REPORT NO. 19  
BASF CORPORATION  
WYANDOTTE, MICHIGAN

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 551

November 9, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

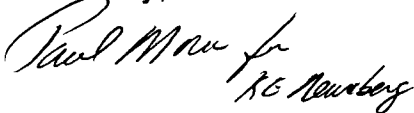
Subject: Monthly Progress Report Number 68  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits monthly Progress Report No. 68 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 19 for the land reclamation project and the CMS Monthly Progress Report No 17.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachments**

i:\ecology\jack\EPA Progress Reports\PRGRES68.doc

cc: J Lanigan - BASF	R Blayer - MDEQ Lansing
MSutherland - PES	LAubuchon - MDEQ Livonia
J Russell - MDEQ Livonia	ADanford - Quanterra
RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 16**

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	September 1 through September 30, 1999
<b>Date of Report:</b>	October 8, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons ES commenced a preliminary evaluation of the aquifer pump test, slug test, and VOC flux data collected during the CMS field program.
- Quanterra continued laboratory analyses of the air, water, and soil samples collected during the CMS field program. Data packages are forwarded to Environmental Standards, Inc. as completed.
- Environmental Standards began to receive data packages from Quanterra and to validate the data. Validation packages are forwarded to Parsons ES as completed.
- Geosphere continued working on the final Geophysical Survey Report.
- The estimated percent completion of the CMS at the end of this reporting period is 31 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

BASF personnel briefed the Wyandotte Community Advisory Panel on the progress of the CMS.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work occurred during this period; therefore, new analytical data and new findings were not generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period; however, BASF understands Ms. Diane Sharrow will be reassigned, and EPA will appoint a new project manager for this site soon.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been completed during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, Quanterra should complete analyses of the samples collected during the Phase II CMS field program. Environmental Standards, Inc. will continue data validation activities, and Parsons ES will continue evaluating the field data collected during the CMS field program. Work on the CMS field report will begin.

BASF expects to receive the Final Geophysical Survey Report. BASF will forward two copies of the report to the EPA when received.

**3b. Anticipated Problems and Proposed Resolutions**

BASF wishes to ensure continuation of efficient communications with EPA when the upcoming change in project management occurs. BASF proposes a meeting among the new Project Manager, Ms. Sharrow, the BASF Project Coordinator, consultants, and other key people involved with the RCRA Corrective Action project. The meeting will bring stakeholders together to facilitate communications during the remainder of this important project.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## **AOC 4 RECLAMATION REPORT NO. 18**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: September 1 Through September 30, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Heritage Environmental Services (a consultant contracted to BASF) provided BASF with draft plans, options, and estimated costs to remove the tarry materials from the ground, treat the materials, and have the materials accepted for recycling or disposal.
- Harding Lawson Associates provided BASF with a draft scope of work document in draft form that addresses the complete a excavation and disposal project at AOC 4.
- BASF continued to evaluate bid documents for a potential freeze-and-excavate reclamation effort.
- BASF and its consultants participated in a number of conference calls and conversations concerning recycling and disposal options for the tarry materials. The estimated cost to complete the work is a prominent discussion item.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Consultants will provide BASF with alternatives for managing the tarry materials. BASF will continue discussing these alternatives with the EPA project manager.
- BASF will continue meeting with contractors and consultants to continue project planning and weighing alternative strategies. When complete, BASF will provide EPA with the anticipated schedule and the scope of work.

This report was completed by:  
**BASF Corporation**

  
**K. Edward Nuernberg**  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 549

October 8, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 67  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits monthly Progress Report No. 67 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 18 for the land reclamation project and the CMS Monthly Progress Report No 16.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachments**

i:\ecology\jack\EPA Progress Reports\PRGRES67.doc

cc: J Lanigan - BASF	R Blayer - MDEQ Lansing
MSutherland - PES	LAubuchon - MDEQ Livonia
J Russell - MDEQ Livonia	ADanford - Quanterra
RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 15**

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	August 1 through August 31, 1999
<b>Date of Report:</b>	September 9, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons ES began Phase II of the CMS field program on Monday August 2, 1999. All field drilling, sampling, and data collection activities associated with the Phase II field program were executed during the month of August, with demobilization from the field occurring on Tuesday August 31, 1999.
- Quanterra commenced analysis of the groundwater and air samples collected during the Phase II CMS field program.
- The estimated percent completion of the CMS at the end of this reporting period is 30 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.



## **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

Parsons ES performed the following field activities at the BASF North Works facility during the month of August 1999 during the Phase II CMS field program:

**Well Installation** – Eighteen monitoring wells were installed at the BASF site. During drilling activities, soils were sampled continuously and the Parsons ES field geologist recorded the lithology. Selected soil samples were submitted to Quanterra for grain-size analysis.

**Mass Flux Evaluation** – A mass flux evaluation in the SWMU H/AOC 5 area was performed to assess whether volatile organic compounds (VOCs) are being emitted from the ground surface at concentrations that constitute an unacceptable risk to human health or the environment. Ten investigative and three quality assurance/quality control (QA/QC) air samples were collected in Summa<sup>®</sup> canisters and shipped to the Quanterra-Knoxville laboratory for analyses of VOCs.

**Well Development** – After completing well installation, the 18 newly installed wells were developed in accordance with the procedures outlined in the Quality Assurance Project Plan (QAPP) standard operating procedures (SOPs). At least 48 hours were allowed to elapse between well installation and well development.

**Groundwater Sampling** – Twenty-nine on-site monitoring wells (11 pre-existing wells and 18 newly installed wells) were sampled in accordance with the guidelines set forth in the QAPP. Groundwater samples collected from the monitoring wells located along the eastern property shoreline were submitted to the Quanterra-North Canton laboratory to be analyzed for calcium, hardness, alkalinity, total dissolved solids (TDS), total solids (TS), total organic carbon (TOC), and chemical oxygen demand (COD). Groundwater samples from monitoring wells located along the northern and southern property boundaries were submitted to Quanterra-North Canton to be analyzed for VOCs, semi-volatile organic compounds (SVOCs), calcium, hardness, alkalinity, TDS, TS, TOC, and COD. In addition, groundwater samples from all 29 wells were analyzed in the field for total iron and ferrous iron.

**Slug Testing** – Slug tests designed to estimate hydraulic conductivity were performed in 33 monitoring wells.

**Pump Testing** – Pump tests designed to evaluate the hydraulic connectivity of the sand and fill layers beneath the site were performed at six nested well pairs. Tests were attempted at a seventh well cluster, but could not be completed when monitoring well PM4NA dried out.

## **1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

## **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

### **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

#### **3a. Anticipated Work**

During the month of September, Parsons ES and BASF anticipate the following work items will be accomplished:

- (1) Quanterra will continue analyses of the groundwater and air samples collected during the Phase II CMS field program.
- (2) As Quanterra releases analytical data, the data packages will be presented to Environmental Standards, Inc. for validation.
- (3) Parsons ES will commence a preliminary evaluation of the field data collected during the field program.
- (4) Geosphere will complete the geophysical survey report and provide copies to Parsons ES and BASF. BASF will present two copies to the EPA.

#### **3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## **AOC 4 RECLAMATION REPORT NO. 15**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: June 1 Through June 30, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- BASF completed reviewing the report on bench-scale test results and passed comments to the authors – Harding Lawson Associates (HLA).
- In summary, the tests found that stabilization and steam-enhanced recovery of the tars are not viable remedial options. BASF directed HLA to finalize the report for distribution to the EPA and DEQ.
- BASF scheduled a meeting with the consultants and potential contractors to complete the planning stage for a freeze-and-excavate reclamation effort. The meeting is scheduled for July 7, 1999.
- On June 29, the BASF Project Coordinator and the EPA Project Manager discussed this project during a telephone conversation.
  - BASF summarized the results of the bench-scale tests, the plans for future work, and the preliminary schedule for land-reclamation.
  - BASF will provide EPA with a copy of the bench-scale test report in early July and a copy of the preliminary work plan for the freeze-and-excavate project by late August 1999.
  - BASF anticipates performing the reclamation work during February and March 2000.
  - The EPA stated they would need approximately 30 to 45 days to review the work plan.

#### **PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF will provide EPA with the bench-scale test report.
- BASF will meet with contractors and consultants to complete project planning. BASF will provide EPA with the anticipated schedule and scope of work. The work plan will be issued by the end of August.

This report was completed by:

**BASF Corporation**



**K. Edward Nuernberg  
General Manager**

## **AOC 4 RECLAMATION REPORT NO. 17**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: August 1 Through August 31, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- BASF presented the final report on bench-scale testing results to the EPA. Harding Lawson Associates (HLA) prepared the report on behalf of BASF.
- BASF received bid documents for a potential freeze-and-excavate reclamation effort. BASF is continuing to evaluate the proposals and the remedial strategy.
- Heritage Environmental Services (a consultant contracted to BASF) provided BASF with results from the treatability, material handling, and TCLP tests. The TCLP result for benzene was 4.3 mg/L.
- BASF and its consultants participated in two conference calls where we discussed recycling and disposal options for the tarry materials. The estimated cost to complete the work also was a prominent discussion item.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Consultants will provide BASF with alternatives for managing the tarry materials as they are removed from the ground. BASF will discuss these alternatives with the EPA project manager.
- BASF will meet with contractors and consultants to continue project planning. When complete, BASF will provide EPA with the anticipated schedule and scope of work.

This report was completed by:

**BASF Corporation**



K. Edward Nuernberg  
General Manager

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 545

September 9, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

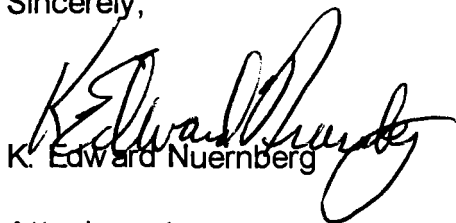
Subject: Monthly Progress Report Number 66  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 66 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 17 for the land reclamation project and the CMS Monthly Progress Report No 15.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

**Attachments**

i:\ecology\jack\EPA Progress Reports\PRGRES66.doc

cc: J Lanigan - BASF	R Blayer - MDEQ Lansing
MSutherland - PES	LAubuchon - MDEQ Livonia
J Russell - MDEQ Livonia	ADanford - Quanterra
RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 14**

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<b>Project:</b>	Corrective Measures Study BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	July 1 through July 31, 1999
<b>Date of Report:</b>	August 6, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- The geophysical contractor Geosphere, Inc. submitted a draft geophysical report to Parsons ES and BASF for review. The report describes the results from the seismic and electro-magnetic surveys performed on the North Works. Parsons ES and BASF provided comments to Geosphere and requested that the comments be addressed in the final report.
- Parsons ES commenced in-office mobilization activities in preparation for phase II of the CMS field program. The field program will commence during the week of August 2, 1999.
- Toltest, Inc., from Toledo, Ohio, was selected as the drilling subcontractor for the CMS field program. Mr. Rick Mielcarek is Toltest's project coordinator.
- The estimated percent completion of the CMS at the end of this reporting period is 24 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

BASF's Project Coordinator, Mr. Jack Lanigan, will be away from the office from August 17 through August 31, 1999. Mr. David Sheaves from BASF's Ecology Services Department will be the acting coordinator during those two weeks. Mr. Sheaves may be reached at 734-324-6836.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the month of August, Parsons ES and BASF anticipate the following work items will be accomplished:

- (1) Geosphere will submit the final geophysical survey report to Parsons ES and BASF. BASF will provide a copy to the EPA.
- (2) Based on the findings in Geosphere's report, Parsons ES will position five new groundwater wells to evaluate the hydraulic conductivity within the former drainage ways.
- (3) The CMS field drilling program will begin on August 2, 1999, and likely will be completed by the end of the month.
- (4) Well development, hydraulic testing, and groundwater sampling will begin during August.
- (5) Parsons ES will collect samples of soil gas from the AOC 5/SWMU H area for mass flux analyses.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## **AOC 4 RECLAMATION REPORT NO. 16**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: July 1 Through July 31, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- BASF directed Harding Lawson Associates (HLA) to finalize the report on bench-scale test results for distribution to the EPA and DEQ. In summary, the tests found that stabilization and steam-enhanced recovery of the tars are not viable remedial options.
- BASF conducted three meetings with the consultants and potential contractors to evaluate and plan a freeze-and-excavate reclamation effort. BASF expects to receive bid documents from the contractors during early August 1999.
- Heritage Environmental Services (a consultant contracted to BASF) collected samples of the tarry material for treatability and material handling tests. They also plan to perform TCLP tests to assess benzene content.
- During July, the BASF Project Coordinator and the EPA Project Manager traded telephone messages but did not discuss any issues material to this project.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF will provide EPA with the bench-scale test report.
- BASF will receive and evaluate the bid documents from the ground-freezing contractors.
- Consultants will provide BASF with alternatives for managing the tarry materials as they are removed from the ground. BASF will discuss these alternatives with the EPA project manager.
- BASF will meet with contractors and consultants to complete project planning. BASF will provide EPA with the anticipated schedule and scope of work. The draft work plan will be issued by the end of August.

This report was completed by:

**BASF Corporation**



K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 547

August 9, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

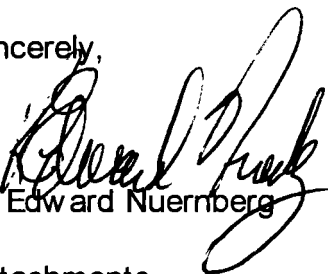
Subject: Monthly Progress Report Number 65  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 65 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 16 for the land reclamation project and the CMS Monthly Progress Report No 14.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

Attachments

i:\ecology\jack\EPA Progress Reports\PRGRES65.doc

cc:	JLanigan - BASF	RBlayer - MDEQ Lansing
	MSutherland - PES	LAubuchon - MDEQ Livonia
	JRussell - MDEQ Livonia	ADanford - Quanterra
	RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 13

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**Project:** Corrective Measures Study  
BASF Corporation, North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** June 1 through June 30, 1999

**Date of Report:** July 6, 1999

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

On June 4, 1999, Parsons ES submitted a report to BASF that summarized the findings from the well development activities Parsons ES performed in May 1999 at the Wyandotte facility, and discussed the implications of the findings. The following is a summary of the discussions.

Parsons wished to identify monitoring wells in good working order for use during the CMS. New and existing wells will be used to perform an evaluation of hydraulic connection; that is, as groundwater is pumped from the fill unit, Parsons will measure drawdown (response) in the sand.

A lack of response in the sand unit may be attributed to (1) poor hydraulic connection between the two units or (2) inadequate characteristics of the sand wells. The well development activities indicate whether the hydraulic characteristics are adequate for the tests. Parsons assumes that a constant pumping rate of at least 0.5 gpm is needed to influence a pumping test.

Based on the pumping tests, wells RFI-MW23, RFI-MW22, RFI-MW1, RFI-MW5, RFI-MW6, and RFI-MW29 appear acceptable for use during the CMS field program. The low pumping at P29N appears to be related to the damage this well appears to have sustained. Parsons wishes to install a new well at P29N.

Wells RFI-MW2 and RFI-MW3 produced 0.1 gpm or less. These wells are screened in a silt unit, and the rates are too slow to be useful during the CMS hydraulic evaluation. They will be replaced by wells RFI-MW13 and RFI-MW14. If tests in these wells are acceptable, Parsons will install CMS-MW3 and CMS-MW4 in the vicinity of RFI-MW13 and RFI-MW14, instead of at the originally proposed locations.

The geophysical contractor, Geosphere, Inc. continued data reduction and evaluation activities on the data collected from the geophysical survey. At the completion of this task, Geosphere will submit a geophysical report to Parsons ES and BASF for review. The final decisions on placement and depth for wells -- relative to the CMS field drilling program -- will be based on the geophysical findings.

The estimated percent completion of the CMS at the end of this reporting period is 21 percent.

Monthly Progress Report  
BASF Wyandotte North Works Facility  
July 6, 1999

**1b. Summary of Changes Made to the CMS**

No changes above and beyond those discussed previously relative to the CMS wells, are anticipated at this time.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical data have been generated. The field data generated from the well development activities have been discussed previously.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, (1) Geosphere will complete the geophysical survey report and present it to Parsons and BASF, (2) Parsons will review the geophysical report and recommend well placement and depths, and (3) Parsons will commence mobilization activities for the drilling/sampling program.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**AOC 4/AOC 7C RECLAMATION REPORT NO. 13****BASF CORPORATION  
WYANDOTTE, MICHIGAN****Reporting Period: April 1 Through April 30, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Cytec Industries Inc. and Western Research Institute (WRI) completed bench-scale tests on the tarry materials from AOC 4. Currently, no more tests are planned.
- Harding Lawson Associates compiled the test data from both Cytec and WRI into a report for BASF. BASF received the Report on April 9, 1999, and we currently are reviewing the data. BASF plans to provide the EPA with a copy of the final Report.

**B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies.
- BASF personnel will continue reviewing the Reports. We expect to have comments prepared for the consultants use by early June 1999.

This report was completed by:

**BASF Corporation**



**K. Edward Neumann  
General Manager**

BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 586

July 6, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 64  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 64 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 15 for the land reclamation project and the CMS Monthly Progress Report No 13.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachments**

i:\ecology\jack\EPA Progress Reports\PRGRES64.doc

cc:	JLanigan - BASF	RBlayer - MDEQ Lansing
	MSutherland - PES	LAubuchon - MDEQ Livonia
	JRussell - MDEQ Livonia	ADanford - Quanterra
	RVitale - Environmental Standards	BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 12**

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**Project:** Corrective Measures Study  
for the BASF Corporation, North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** May 1 through May 31, 1999

**Date of Report:** June 8, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- The CMS field program commenced on May 17, 1999, with a kick-off meeting at the BASF Wyandotte facility. In attendance at the meeting were representatives from Geosphere, the geophysical contractor; Ms. Mona Sutherland, and Mr. William Borchardt and Mr. Sasa Jazic with Parsons ES; and Mr. Jack Lanigan and Mr. John Gerlach with BASF. During the kick-off meeting, the goals and objectives of the CMS field program and the associated geophysical work were discussed. All meeting attendees performed a site walkthrough to look at the various areas where geophysical work would be performed. During the site walkthrough, the existing monitoring wells identified for incorporation into the CMS field program were located.
- The geophysical survey activities and the development of the existing wells identified for incorporation into the CMS field program began on May 18, 1999. Geosphere performed the geophysical activities and completed this work on May 28, 1999. Parsons ES personnel performed the well development activities and completed this work on May 21, 1999.
- The estimated percent completion of the CMS at the end of this reporting period is 19 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or analytical work related to the CMS scope of work occurred during this period; therefore, no analytical data have been generated. The field activities performed during the reporting period are described in Section 1a, above. It is premature to present a summary of findings at this time.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, Geosphere will download the information collected from the field survey and will commence work associated with reducing and interpreting the data.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 14**

**BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**Reporting Period: May 1 Through May 31, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

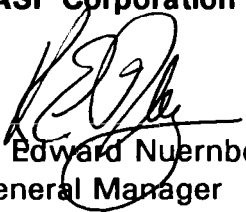
- BASF received the report of bench-scale test results on April 9, 1999, and we currently are reviewing the data. BASF plans to provide the EPA with a copy of the final Report.

### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies.
- BASF personnel will continue reviewing the Reports. We expect to have comments prepared for the consultants use by July 1999.

This report was completed by:

**BASF Corporation**

  
K. Edward Nuernberg  
General Manager



BASF Corporation

**BASF**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 263 958 212**

June 9, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

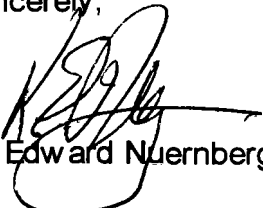
Subject: Monthly Progress Report Number 63  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 63 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 14 for the land reclamation project and the CMS Monthly Progress Report No 12.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

Attachment

i:\ecology\jack\EPA Progress Reports\PRGRES63.doc

cc: J Lanigan - BASF  
MSutherland - PES  
JRussell - MDEQ Livonia  
RVitale - Environmental Standards

RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra  
BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 11**

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<b>Project:</b>	Corrective Measures Study for the BASF North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	April 1 through April 30, 1999
<b>Date of Report:</b>	May 10, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- BASF submitted the sixty-first monthly progress report to EPA on April 9, 1999.
- BASF processed Parsons ES' authorization for the CMS field program.
- On April 29, 1999, Parsons ES received authorization from BASF to proceed with the CMS field program.
- Parsons ES coordinated with BASF and Geosphere (the geophysical contractor) on the schedule for the CMS field program. It was decided that the CMS field program would commence the week of May 17, 1999.
- The estimated percent completion of the CMS at the end of this reporting period is 17 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**1g. Community Relations**

Progress Report No. 61 will be included with the May 6, 1999 Community Advisory Panel (CAP) meeting minutes.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

Parsons ES will execute mobilization activities for the CMS field program. In addition, Phase the field program (which entails the execution of geophysical activities and the development the existing site wells that will be part of the CMS field investigation) will commence.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 13**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: April 1 Through April 30, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

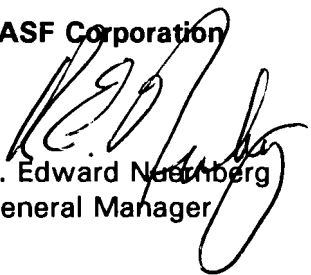
- Cytec Industries Inc. and Western Research Institute (WRI) completed bench-scale tests on the tarry materials from AOC 4. Currently, no more tests are planned.
- Harding Lawson Associates compiled the test data from both Cytec and WRI into a report for BASF. BASF received the Report on April 9, 1999, and we currently are reviewing the data. BASF plans to provide the EPA with a copy of the final Report.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies.
- BASF personnel will continue reviewing the Reports. We expect to have comments prepared for the consultants use by early June 1999.

This report was completed by:

**BASF Corporation**

  
K. Edward Neumann  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 058 363 546**

May 10, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 62  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

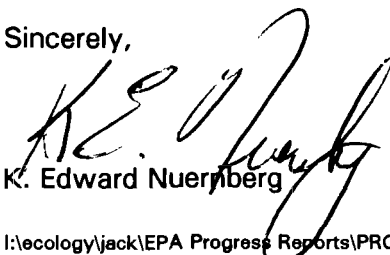
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 62 for the work performed on the RCRA Corrective Action under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 1999. Please find attached the monthly AOC 4/AOC 7C Reclamation Report No. 13 for the land reclamation project and the CMS Monthly Progress Report No 11.

On March 18, 1999, BASF received EPA's approval of the RCRA Facility Investigation Report. The RFI Phase of the Corrective Action is complete, and Monthly Reports for that phase of the work will no longer be submitted.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

I:\ecology\jack\EPA Progress Reports\PRGRES62.doc

cc: J Lanigan - BASF  
MSutherland - PES  
JRussell - MDEQ Livonia  
BWallace - Bacon Memorial Public Library  
RBlayer - MDEQ Lansing  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra

## CMS MONTHLY PROGRESS REPORT NO. 10

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**Project:** Corrective Measures Study  
for the BASF North Works Site  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** March 1 through March 31, 1999

**Date of Report:** April 8, 1999

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- EPA Region V provided BASF with written approval of the QAPP Addendum No. 1 for the CMS Field Program in a letter dated 15 March 1999 addressed to Mr. K. Edward Nuernberg at BASF Corporation.
- The estimated percent completion of the CMS at the end of this reporting period is 17 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No issues were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

#### 1f. Key Project Personnel Changes

No key personnel changes occurred during this period.

## **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

## **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

### **3a. Anticipated Work**

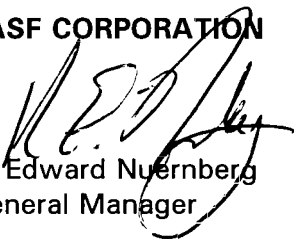
Parsons ES will commence mobilization activities in preparation for the CMS field program. The geophysical assessment task will be the first field task, and it may begin as early as April 26, weather permitting. BASF will provide scheduling updates to EPA as they are identified.

### **3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

**PROGRESS REPORT NO. 61**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD March 1 Through March 31, 1999**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the sixtieth monthly progress report to EPA on March 9, 1999.

QST completed the Final RFI Report and submitted it to the EPA on March 4, 1999.

BASF received approval for the RFI Report from the EPA on March 18, 1999.

**B. WORK COMPLETED**

All field work, analytical work, data validation, and reporting are complete for the RFI.

All requirements for the RFI phase of the work are complete.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 60 will be included with the May 1999 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

Progress Reports No. 60 and 61 will be included with the May 1999 CAP meeting minutes. That meeting is scheduled for May 6, 1999. All other work for the RFI is complete.



**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH EPA**

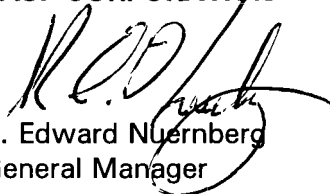
There were no meetings with EPA. On March 12, 1999, the EPA Project Manager, Ms. Diane Sharrow, and the BASF Project Coordinator, Mr. Jack Lanigan, discussed completion of the RFI Report and approval of the CMS QAPP.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 12**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: March 1 Through March 31, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

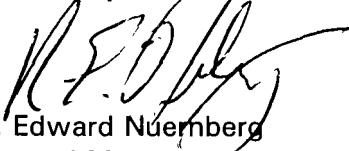
- Cytec Industries Inc. and Western Research Institute (WRI) completed bench-scale tests on the tarry materials from AOC 4. Currently, no more tests are planned.
- Cytec continued preparation of their laboratory report to document the test procedures and results from the stabilization tests.
- Harding Lawson Associates is compiling the test data from both Cytec and WRI into a report for BASF and the EPA.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies.
- BASF personnel, in cooperation with their consultants and laboratories, will complete the reports documenting the protocols and results of the bench-scale tests supporting this land-reclamation project. BASF expects to receive the draft report during early April 1999.

This report was completed by:

**BASF Corporation**



K. Edward Nuernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 058 363 530**

April 8, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report Number 61  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

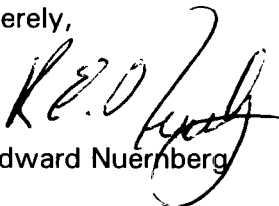
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 61 for the work performed on the RCRA Facility Investigation under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 1999. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 12 for the land reclamation project and CMS Monthly Progress Report No 10.

On March 18, 1999, BASF received EPA's approval of the RCRA Facility Investigation Report. The RFI Phase of the Corrective Action is complete, and the final Monthly Report for that phase of the work is attached.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

I:\ecology\jack\EPA Progress Reports\PRGRES61.doc

cc:	JLanigan - BASF	RBlayer - MDEQ Lansing
	MSutherland - PES	LAubuchon - MDEQ Livonia
	JRussell - MDEQ Livonia	ADanford - Quanterra
	BWallace - Bacon Memorial Public Library	

## CMS MONTHLY PROGRESS REPORT NO. 9

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**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Jack Lanigan, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** February 1 through February 28, 1999

**Date of Report:** March 9, 1999

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES revised the Quality Assurance Project Plan (QAPP) addendum associated with the CMS field program, based on BASF's internal review comments. The revised document was submitted to BASF for final review.
- BASF and Parsons ES presented the QAPP Addendum to the EPA on February 9, 1999, for review and approval.
- The estimated percent completion of the CMS at the end of this reporting period is 17 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No issues were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

BASF and Parsons ES delivered the QAPP Addendum to the EPA on February 9, 1999.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, BASF and Parsons ES anticipate EPA providing approval for the QAPP addendum. Mobilization activities associated with the CMS field program will commence after the USEPA Region V provides BASF with written approval of the QAPP addendum.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

**PROGRESS REPORT NO. 60**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD February 1 Through February 28, 1999**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty-ninth monthly progress report to EPA on February 8, 1999.

QST completed the risk assessment for AOC 1 and AOC 8, and incorporated the results into the RFI Report.

QST completed incorporating the validated data into the RFI Report.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work are complete for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 59 was included with the March 1999 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

This progress report will be included with the May Community Advisory Panel (CAP) meeting minutes.

BASF and QST will complete the revisions to the RFI Report and present the Report to the EPA.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**


There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**



K. Edward Kuernberg  
General Manager

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## **AOC 4/AOC 7C RECLAMATION REPORT NO. 11**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: February 1 Through February 28, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Cytec Industries Inc. and Western Research Institute (WRI) completed bench-scale tests on the tarry materials from AOC 4. Currently, no more tests are planned.
- BASF received a draft Report of Findings from WRI.
- Cytec continued preparation of their laboratory report to document the test procedures and results. Harding Lawson Associates will compile the test data into a report for BASF and the EPA.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies, including ground freezing.
- BASF personnel, in cooperation with their consultants and laboratories, will continue and possibly complete the reports documenting the protocols and results of the bench-scale tests supporting this land-reclamation project at AOC 4.

This report was completed by:

**BASF Corporation**



K. Edward Nuernberg  
General Manager

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K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 543

March 9, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

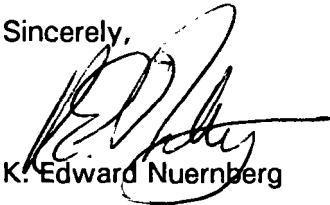
Subject: Monthly Progress Reports  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 60 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 1999. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 11 for the land reclamation project and CMS Monthly Progress Report No 9.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg

I:\ecology\jack\EPA Progress Reports\PRDRES60.doc

cc: JLanigan - BASF  
MSutherland - PES  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra

DMarian - QST  
RBlayer - MDEQ Lansing  
JRussell - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 8**

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	January 1 through January 31, 1999
<b>Date of Report:</b>	February 8, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons ES prepared the Quality Assurance Project Plan (QAPP) addendum associated with the CMS field program and submitted it to BASF for internal review.
- BASF reviewed the internal draft copy of the QAPP addendum and provided Parsons ES with comments to address.
- Parsons ES commenced modifications to the QAPP addendum to address BASF's comments.
- The estimated percent completion of the CMS at the end of this reporting period is 17 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

#### **1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

During the next reporting period, Parsons ES will:


- (1) complete the preparations and modifications of the QAPP addendum,
- (2) submit the QAPP addendum to BASF for final review and approval, and
- (3) submit the QAPP addendum to the USEPA Region V for review.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

i:\ecology\Jack\EPA Progress Reports\CMS-#8

**PROGRESS REPORT NO. 59**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD January 1 Through January 31, 1999**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty-eighth monthly progress report to EPA on January 7, 1999.

QST completed the risk assessment for AOC 1 and AOC 8, and they incorporated the results into the RFI Report.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work are complete for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

*There were no findings or changes.*

**D. COMMUNITY RELATIONS**

Progress Report No. 58 was included with the January 14, 1999 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

This progress report will be included with the March Community Advisory Panel (CAP) meeting minutes.

BASF and QST will complete the revisions to the RFI Report and present the Report to the EPA.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

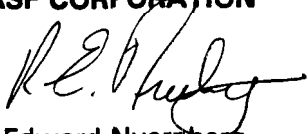
There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in black ink, appearing to read 'K. E. Nuernberg', is written over the printed name.

K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 10**

**BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**Reporting Period: January 1 Through January 31, 1999**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Cytec Industries Inc. and Western Research Institute (WRI) completed bench-scale tests on the tarry materials from AOC 4. Currently, no more tests are planned.
- BASF received preliminary verbal reports from Cytec during a conference on January 4, 1999. Test results indicate stabilization in place does not appear to be a viable option. Treatability test results indicate ground freezing with bulk excavation may be a feasible option.
- Cytec and WRI continued preparation of their laboratory reports to document the test procedures and results. Harding Lawson Associates will compile the test data into a report for BASF and the EPA.

### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies, including ground freezing.
- BASF personnel, in cooperation with their consultants and laboratories, will continue and possibly complete the reports documenting the protocols and results of the bench-scale tests supporting this land-reclamation project at AOC 4. BASF anticipates a report of findings can be presented to the EPA by March 1.

This report was completed by:

**BASF Corporation**



**K. Edward Nuernberg  
General Manager**

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K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 058 363 541

February 8, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

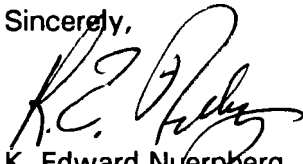
Subject: Monthly Progress Reports  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 59 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 1999. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 10 for the land reclamation project and CMS Monthly Progress Report No 8.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg  
General Manager

i:\ecology\Jack\EPA Progress Reports\PRGRES59.doc

cc:	JLanigan - BASF	DMarian - QST
	MSutherland - PES	RBlayer - MDEQ Lansing
	LAubuchon - MDEQ Livonia	JRussell - MDEQ Livonia
	ADanford - Quanterra	BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 7**

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<b>Project:</b>	Corrective Measures Study for the BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	December 1 through December 31, 1998
<b>Date of Report:</b>	January 6, 1999

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons Engineering Science, Inc. (Parsons ES) commenced the preparation of the project quality assurance project plan (QAPP) addendum for the CMS field program.
- Parsons ES commenced coordination with the Quanterra-North Canton laboratory and the drilling company Carlo Environmental Technologies, on the upcoming CMS field program.
- Parsons ES prepared and submitted Requests for Quotation for geophysical work related to the CMS field program.
- The estimated percent completion of the CMS at the end of this reporting period is 16 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.



**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

No key personnel changes occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS were generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

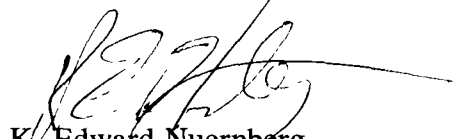
During the next reporting period, Parsons ES will complete the preparation of the addendum to the existing project QAPP, and will submit a draft document to BASF for internal review.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

**PROGRESS REPORT NO. 58**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD December 1 Through December 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty-seventh monthly progress report to EPA on December 5, 1998.

Environmental Standards Inc. completed revising the data validation reports.

QST completed the risk assessment for AOC 1 and AOC 8, and they began incorporating the results into the RFI Report.

QST continued incorporating the validated data into the tables and figures in the RFI Report.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work are complete for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 57 will be included with the January 14, 1999 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

This progress report will be included with the January Community Advisory Panel (CAP) meeting minutes.

BASF and QST will complete the revisions to the RFI Report and present the Report to the EPA.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

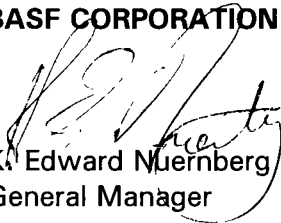
There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

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## **AOC 4/AOC 7C RECLAMATION REPORT NO. 09**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: December 1 Through December 31, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

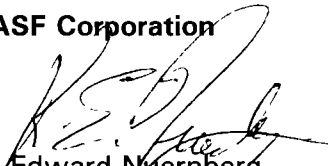
- Cytec Industries Inc. and Western Research Institute (WRI) completed bench-scale tests on the tarry materials from AOC 4.
- Cytec evaluated several categories of amendments and optimum mixing ratios. Cytec also complete all mixing tests using their Processall Mixer. No more tests are planned.
- WRI completed all six tests to evaluate the steam-enhanced recovery alternative. Currently, no more tests are planned.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF will receive preliminary verbal reports from the laboratories. The meeting is scheduled for January 4, 1999.
- Because initial findings from the bench-scale tests have not been encouraging, BASF is considering alternative reclamation technologies, including ground freezing.
- BASF personnel, in cooperation with their consultants and laboratories, will continue and possibly complete the reports documenting the protocols and results of the bench-scale tests supporting this land-reclamation project at AOC 4. BASF anticipates a report of findings can be presented to the EPA by March 1.

This report was completed by:

**BASF Corporation**



K. Edward Muernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 355 729 017

January 7, 1999

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

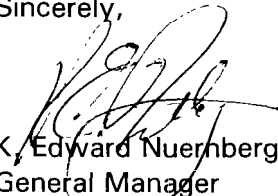
Subject: Monthly Progress Reports  
RCRA Corrective Action  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 58 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 1998. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 09 for the land reclamation project and CMS Monthly Progress Report No 7.

Should you need additional information, please contact Mr. Jack Lanigan at your convenience.

Sincerely,



K. Edward Nuernberg  
General Manager

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cc:	JLanigan - BASF	DMarian - QST
	MSutherland - PES	RBlayer - MDEQ Lansing
	LAubuchon - MDEQ Livonia	JRussell - MDEQ Livonia
	ADanford - Quanterra	BWallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 6

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<b>Project:</b>	Corrective Measures Study BASF Corporation, North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Jack Lanigan, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	November 1 through November 30, 1998
<b>Date of Report:</b>	December 4, 1998

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- In a letter dated November 20, 1998, to the BASF General Manager, Mr. Edward Nuernberg, the USEPA Region V Project Manager, Ms. Diane Sharrow stated that the Draft CMS Work Plan submitted by BASF had been approved by the Agency.
- Parsons Engineering Science, Inc. (Parsons ES) commenced the process of identifying which standard operating procedures would have to be amended and/or generated anew as part of the project quality assurance project plan (QAPP) amendment.
- The estimated percent completion of the CMS at the end of this reporting period is 14 percent.

#### 1b. Summary of Changes Made to the CMS

No changes to the CMS were requested during this period.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No issues were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

### **1f. Key Project Personnel Changes**

During this reporting period, Mr. Jack Lanigan replaced Mr. Bruce Roberts as the BASF Project Coordinator.

### **2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

### **3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

#### **3a. Anticipated Work**

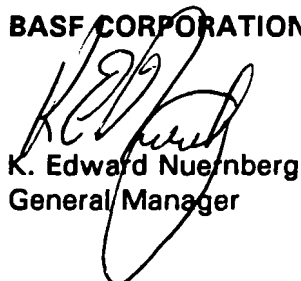
During the next reporting period, Parsons ES will commence the preparation of the addendum to the existing project QAPP, and will commence procurement/coordination activities with the subcontractors that will be utilized to execute the CMS field program.

#### **3b. Anticipated Problems and Proposed Resolutions**

The mass flux evaluation was anticipated to be the first field task executed as part of the CMS field program. However, as stated in the CMS Work Plan, this field activity cannot be executed if there is precipitation (rain or snow) present on the ground, in the area(s) of interest. It is anticipated that this field activity will have to be postponed until weather conditions are conducive to its execution. Depending on the intensity and duration of the winter season, this may delay the mass flux evaluation until sometime in Spring 1999.

This report was completed by:

**BASF CORPORATION**



K. Edward Nueenberg  
General Manager

**PROGRESS REPORT NO. 57**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD November 1 Through November 30, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty-sixth monthly progress report to EPA on November 5, 1998

Environmental Standards Inc. completed revising the data validation reports.

QST conducted a preliminary risk assessment for AOC 1 and AOC 8.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work are complete for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 56 was included with the November 5, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

Effective December 1, 1998, Mr. Jack Lanigan is BASF Corporation's Project Coordinator for the RCRA Corrective Action work.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the December Community Advisory Panel (CAP) meeting minutes.



2. BASF and QST will begin evaluating the impact of the revisions to the validated data received from Environmental Standards Inc. and begin revising the Draft RFI Report as required.
3. QST will incorporate the preliminary risk assessment for AOC1 and AOC 8 into the Draft RFI Report.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

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## **AOC 4/AOC 7C RECLAMATION REPORT NO. 08**

**BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**Reporting Period: November 1 Through November 30, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Cytec Industries Inc. and Western Research Institute (WRI) continued bench-scale tests on the tarry materials from AOC 4.
- Cytec evaluated several categories of amendments and optimum mixing ratios.
- WRI completed four tests to evaluate the steam-enhanced recovery alternative. A fifth test is underway. Currently, no more than these five tests are planned.
- BASF personnel visited the two laboratories to observe the procedures and results.
- Land reclamation activities at AOC 7C were completed during October. This is the final report for that activity.

### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Cytec and WRI will continue (and possibly complete) the bench-scale tests.
- BASF personnel, in cooperation with their consultants and laboratories, will begin preparation of reports documenting the protocols and results of the bench-scale tests supporting the land-reclamation project at AOC 4.

This report was completed by:

**BASF Corporation**



**K. Edward Nuernberg  
General Manager**

K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 355 729 011

December 4, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 57  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

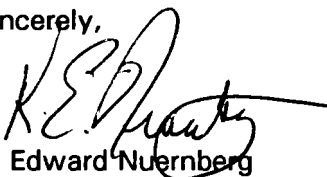
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 57 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 1998. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 08 for the land reclamation project and CMS Monthly Progress Report No 6.

This letter also serves as formal notification that BASF Corporation changed Project Coordinators for the RCRA Corrective Action project. Effective December 1, 1998, Mr. Bruce Roberts was assigned to be the Ecology Coordinator at our Bourke Avenue facility. Mr. Jack Lanigan replaces Mr. Roberts. Jack can be reached at (734) 324-6219, and his mailing address is here at the Wyandotte, North Works Site.

Should you need additional information please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachments - Progress Reports  
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cc: J Lanigan - BASF  
MSutherland - PES  
LAubuchon - MDEQ Livonia  
ADanford - Quanterra

DMarian - QST  
RBlayer - MDEQ Lansing  
JRussell - MDEQ Livonia  
BWallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 5**

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**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Bruce D. Roberts, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** October 1 through October 31, 1998

**Date of Report:** November 4, 1998

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons Engineering Science, Inc. (Parsons ES) continued work on and completed the preparation of the Draft CMS Work Plan. Two copies of the completed draft document were submitted to the USEPA Region V Project Manager, Ms. Diane Sharrow, on October 27, 1998, for review and comment.
- Parsons ES worked on and completed the update of the Report of Current Conditions. Two copies of the completed updated document were submitted to Ms. Sharrow on October 27, 1998.
- On October 29, 1998, Parsons ES determined that Table 23-3 of the updated Report of Current Conditions had been inadvertently omitted from the documents submitted to Ms. Sharrow. On October 29, 1998, two copies of the omitted table were sent to Ms. Sharrow via overnight mail delivery, for inclusion in the updated Report of Current Conditions.
- The estimated percent completion of the CMS at the end of this reporting period is 13 percent.

#### **1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No issues were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period. Therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

No key project personnel changes have occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

**2a. The following deliverables were submitted to the USEPA Region V during this period:**

- The Draft RCRA CMS Work Plan was hand delivered on October 27, 1998.
- The updated Report of Current Conditions was hand delivered on October 27, 1998.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**


Upon receiving verbal approval from the USEPA Region V on the Draft CMS Work Plan, Parsons ES will prepare the addendum to the existing quality assurance project plan (QAPP). The addendum will address the activities, standard operating procedures (SOPs), and roles/responsibilities associated with the CMS field program Parsons ES will execute, which are not currently covered in the existing QAPP. Parsons ES will also initiate preparatory activities associated with the mass flux field program.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**PROGRESS REPORT NO. 56**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD October 1 Through October 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

*BASF submitted the fifty fifth monthly progress report to EPA on October 8, 1998.*

*Environmental Standards Inc. completed revising the data validation reports.*

*QST conducted a preliminary risk assessment for AOC 1 and AOC 8.*

**B. WORK COMPLETED**

*All field work, analytical work, and data validation work have completed for the RFI.*

**C. SUMMARY OF THE FINDINGS AND CHANGES**

*There were no findings or changes.*

**D. COMMUNITY RELATIONS**

*Progress Report No. 55 was included with the September 03, 1998 Community Advisory Panel (CAP) meeting minutes.*

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

*There were no problems encountered.*

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

*There were no problems encountered.*

**G. CHANGES IN THE KEY PERSONNEL**

*There were no changes in personnel.*

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the November 05, 1998 Community Advisory Panel (CAP) meeting minutes.
2. BASF and QST will begin evaluating the impact of the revisions to the validated data received from Environmental Standards Inc. and begin revising the Draft RFI Report as required.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD (Continued)**

3. QST will incorporate the preliminary risk assessment for AOC1 and AOC 8 into the Draft RFI Report.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in black ink, appearing to read "K. Edward Nuernberg", followed by a stylized flourish.

K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 07**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: October 1 Through October 31, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Cytec Industries Inc. and Western Research Institute (WRI) completed safety tests on the tarry materials from AOC 4 and began the bench-scale tests. Harding Lawson Associates collected the materials during September.
- Cytec began the preliminary mixing experiments to evaluate the stabilization alternative. They are evaluating several categories of amendments and optimum mixing ratios.
- WRI completed two tests to evaluate the steam-enhanced recovery alternative. The third test is underway. Currently, no more than seven tests are planned.
- BASF contracted Vac-All of Taylor, Michigan, to excavate the soils containing Prussian Blue and to transport the soils to Waste Management's Woodland Hills Landfill in Wayne, Michigan.
- Six hundred cubic yards of soils containing Prussian Blue were excavated, transported, and landfilled. The excavation was filled with clean soils obtained locally.
- Land reclamation activities at AOC 7C are complete. This is the final report for that activity.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Cytec and WRI will continue (and possibly complete) the bench-scale tests.
- BASF personnel will visit the two laboratories to observe the procedures and results.
- BASF personnel, in cooperation with their consultants and laboratories, will begin preparation of reports documenting the protocols and results of the bench-scale tests supporting the land-reclamation project at AOC 4.

This Report was completed by:  
**BASF Corporation**

  
K. Edward Nuernberg  
General Manager

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K. Edward Nuernberg  
General Manager  
Wyandotte Site

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z: 355 729 010

November 6, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

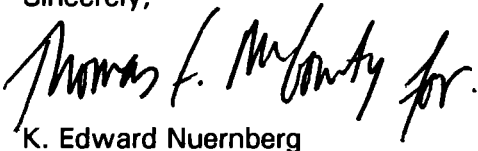
Subject: Monthly Progress Report No. 56  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 56 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 1998. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 07 for the land reclamation project and CMS Monthly Progress Report No 5.

Should you need additional information please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachments - Progress Reports  
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cc: B. Roberts - BASF  
D. Marian - QST  
M. Sutherland - PES  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library



## CMS MONTHLY PROGRESS REPORT NO. 4

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**Project:** Corrective Measures Study  
for the BASF Wyandotte North Works Facility  
1609 Biddle Avenue  
Wyandotte, Michigan 48192

**Respondent Project Coordinator:** Bruce D. Roberts, BASF Corporation

**Parsons ES Project Manager:** Mona D. Sutherland

**Reporting Period:** September 1 through September 30, 1998

**Date of Report:** October 8, 1998

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- In a letter dated September 4, 1998, from BASF to the USEPA Region V RPM Ms. Diane Sharrow, BASF formerly requested that the submittal date for the CMS Work Plan be extended to October 27, 1998.
- In a letter dated September 11, 1998, Ms. Sharrow provided BASF with written approval to submit the CMS Work Plan to the USEPA Region V on or before October 27, 1998.
- Parsons Engineering Science, Inc. (Parsons ES) developed the scope of work for the upcoming field program that will be performed by Parsons ES in support of the CMS. Parsons ES prepared an outline of the scope of work and submitted it to BASF for internal review. BASF and Parsons ES subsequently participated in several teleconference discussions that resulted in the refinement of the approach and scope of the proposed field program.
- On September 30, 1998, BASF and Parsons ES held a teleconference discussion with Ms. Sharrow. The primary objective of the call was to discuss the contents of the CMS Work Plan. It was agreed by all parties that until the proposed CMS field program has been completed it will not be possible for the CMS Work Plan submitted by BASF in October to address many of the requirements (work plan elements) specified in the Consent Order scope of work for the CMS Work Plan. Instead, Ms. Sharrow requested that all the work plan elements be identified in the October submittal, and where information is currently not available, this should be specified, and a discussion on when the information will be provided stated therein. It was also stated by Ms. Sharrow during this conference call that the amendments to the project QAPP, which address the upcoming CMS field work, can be prepared and submitted to the USEPA after USEPA has provided BASF with verbal concurrence on the proposed field program. Ms. Sharrow indicated that BASF will not have to amend the existing project QAPP to meet current Region V QAPP format requirements.
- The estimated percent completion of the CMS at the end of this reporting period is 9 percent.

**1b. Summary of Changes Made to the CMS**

No changes to the CMS were requested during this period.

**1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

**1d. Problems/Issues Encountered and Resolutions**

No issues above and beyond those discussed in Part 1a (above) were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

No key project personnel changes have occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

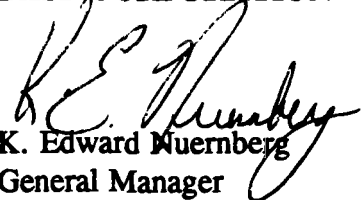
Parsons ES will work on preparing the CMS Work Plan, including the update to the Current Conditions Report.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Muernberg  
General Manager

**PROGRESS REPORT NO. 55**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD September 1 Through September 30, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty forth monthly progress report to EPA on September 8, 1998.

BASF submitted a draft data validation response to the RFI Report comments from Environmental Standards Inc..

BASF submitted analytical data, for AOC 1 and AOC 8, to QST to conduct a preliminary risk assessment.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have been completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 54 was included with the September 3, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the September 3, 1998 Community Advisory Panel (CAP) meeting minutes.
2. Environmental Standards Inc. will respond to any EPA comments received associated with data validation draft response.
3. QST will conduct a preliminary risk assessment for AOC1 and AOC 8.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

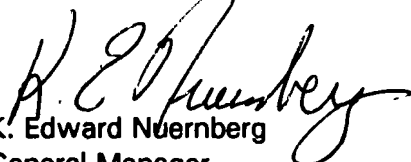
There was a brief telephone conversation between Ms. Diane Sharrow with EPA and Mr. Bruce Roberts with BASF on September 2 concerning the extent of changes EPA expects or desires in the current conditions report.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**AOC 4/AOC 7C RECLAMATION REPORT NO. 06**

**BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**Reporting Period: September 1 Through September 30, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.


**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Harding Lawson Associates in cooperation with Carlo Environmental Technologies used a drilling rig, hollow-stem augers, and split-spoon samplers to obtain representative samples of tarry materials from AOC 4.
- The samples were shipped to the bench-scale testing laboratories -- Cytec Industries Inc. and Western Research Institute (WRI) -- for preparation.
- Both Cytec and WRI performed preliminary safety tests on the materials to ensure the materials are handled properly in the laboratory.
- BASF representatives staked out the extent of known Prussian Blue at AOC 7C.
- BASF selected Vac-All of Taylor, Michigan, to be the excavation and transportation contractor for the soils containing Prussian Blue. Vac-All will transport the soils to Michigan Disposal, Waste Treatment Plant in Belleville, Michigan, for disposal.
- BASF and Vac-All personnel conducted a kick-off meeting initiating this project.

**B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- Cytec and WRI are required to give BASF personnel seven-days notice of when they will begin the bench-scale tests. BASF expects to receive those notices in early October.
- Cytec and WRI should begin and possibly complete the bench-scale tests of the tarry materials.
- Excavation and off-site transport of soils from AOC 7C should be complete. Excavation activities will be followed by backfilling with suitable soils.
- BASF personnel, in cooperation with their consultants and laboratories, will begin preparation of reports documenting the protocols and results of the land-reclamation projects bench scale studies.

This Report was completed by:  
**BASF Corporation**

  
K. Edward Nuernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 355 729 009**

October 8, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 55  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 55 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 1998. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 06 for the land reclamation project and CMS Monthly Progress Report No 4.

Should you need additional information please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

**Attachments**

z:\zword\admin\prgres55.kb

cc: B. Roberts - BASF  
D. Marian - QST  
M. Sutherland - PES  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

## CMS MONTHLY PROGRESS REPORT NO. 3

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce D. Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	August 1 through August 31, 1998
<b>Date of Report:</b>	September 8, 1998

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### 1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD

#### 1a. Work Performed, Significant Developments, and Percentage of the CMS Completed

- Parsons ES strategized to develop a field investigation program that would provide the necessary information on the subsurface fill and sand units at the North Works facility.
- Parsons ES personnel and BASF personnel attended a project meeting at the North Works facility on August 24, 1998 to discuss different approaches to acquiring the information needed to fill in the data gaps and facilitate preparation of the CMS.
- The estimated percent completion of the CMS at the end of this reporting period is 7 percent.

#### 1b. Summary of Changes Made to the CMS

There were no changes made to the CMS.

#### 1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups

No contacts occurred during this period.

#### 1d. Problems/Issues Encountered and Resolutions

No problems were encountered during this period.

#### 1e. Sampling, Analytical, and Field Activities and Summary of Findings

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.



**1f. Key Project Personnel Changes**

No key project personnel changes have occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

Parsons ES will (1) develop the scope of work for the proposed additional field activities relative to the CMS, and (2) continue work on the CMS Work Plan.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

**SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

On August 31, 1998, the BASF project manager Mr. Bruce Roberts, and the Parsons ES project manager Ms. Mona Sutherland had a teleconference with the USEPA Region V RPM Ms. Diane Sharrow, to discuss the field investigation activities that have been developed to fill in data gaps in support of the CMS. Mr. Roberts and Ms. Sutherland provided Ms. Sharrow with an overview of the proposed field work and requested that the due date for the CMS Work Plan be amended to October 27, 1998. Ms. Sharrow provided verbal approval of the amended CMS Work Plan submittal date, and requested that BASF submit written correspondence to USEPA Region V that formally requests the schedule change. There was a discussion concerning beginning the field work before it is approved by EPA. It was also agreed during the teleconference that soil boring/well installation activities associated with the field program would not commence until after the USEPA Region V has had an opportunity to review the Draft CMS Work Plan. BASF will probably begin at risk with the flux chamber tests because of falling soil temperatures. The possibility of sending EPA a working copy of the CMS Work Plan in mid October was discussed. The question of the amount of data validation for work associated with the CMS was discussed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**PROGRESS REPORT NO. 54**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD August 1 Through August 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty third monthly progress report to EPA on August 6, 1998.

BASF and Parsons began formulating the objectives for the CMS Work Plan.

A contractual agreement was reached with Environmental Standards Inc. to begin responding to the RFI Report comments.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have been completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 53 will be included with the September 3, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the September 3, 1998 Community Advisory Panel (CAP) meeting minutes.
2. Environmental Standards Inc. will continue to address final EPA comments associated with data validation.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There was a telephone conversation between Ms. Diane Sharrow with EPA, Ms. Mona Sutherland with Parsons, and Mr. Bruce Roberts with BASF on August 31 concerning timing for the CMS work plan.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## AOC 4/AOC 7C RECLAMATION REPORT NO. 05

### BASF CORPORATION WYANDOTTE, MICHIGAN

**Reporting Period: August 1 Through August 31, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD

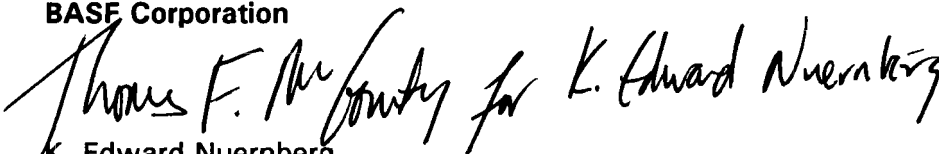
- BASF received and reviewed a draft work plan prepared by Harding Lawson Associates (HLA) which incorporated standard operating procedures proposed for use by the laboratories (Cytec and Western Research Institute).
- BASF representatives met with HLA, presented our comments on the draft work plan, and agreed to a schedule for its revision.
- BASF contracted with Carlo Environmental Technologies to advance borings and collect samples of tar and soils from AOC 4 for the laboratories to use in the bench-scale tests.
- There has been no progress on reclamation of the AOC 7C area.

#### B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD

- BASF will receive the revised final work plan for the bench-scale tests from HLA.
- HLA and Carlo will advance borings in AOC 4, collect samples, and BASF will ship the samples to the laboratories.
- The laboratories will begin their bench-scale tests by measuring physical properties and behaviors of the materials from AOC 4. Results from the initial tests will describe viscosity, vapor pressures, VOC content, leachability, and similar physical parameters. Initial tests will evaluate the materials through temperatures ranging from -20°F to 210°F.
- Test for freezing, stabilizing, and steaming are scheduled to begin in October 1998.
- BASF will solicit proposals for reclamation work at the AOC 7C area.

This Report was completed by:

**BASF Corporation**

  
K. Edward Nuernberg  
General Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 355 729 005

September 8, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

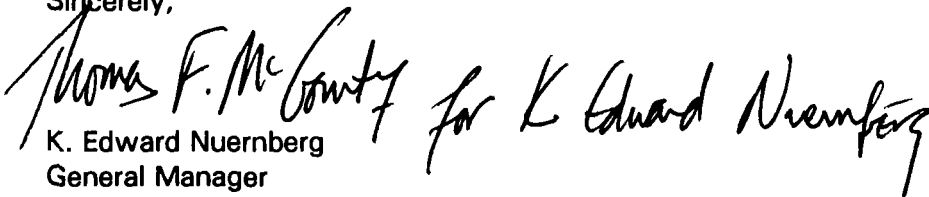
Subject: Monthly Progress Report No. 54  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 54 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1998. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 05 for the land reclamation project and CMS Monthly Progress Report No 3.

Should you need additional information please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg  
General Manager

Attachments - Progress Reports  
z:\zword\admin\prgres54.kb

cc: B. Roberts - BASF  
D. Marian - QST  
M. Sutherland - PES  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce D. Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	July 1 through July 31, 1998
<b>Date of Report:</b>	August 4, 1998

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## **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons Engineering Science, Inc. (Parsons ES) executed various project tasks to facilitate Parsons ES's familiarization with past facility operations, and past project investigation work and findings. These activities included the review of various existing project reports and a visual drive-through tour of the Wyandotte North Works facility.
- The estimated percent completion of the CMS at the end of this reporting period is 4 percent.

### **1b. Summary of Changes Made to the CMS**

- No changes to the CMS were requested during this period.

### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

- No contacts occurred during this period.

### **1d. Problems/Issues Encountered and Resolutions**

- Based on Parsons ES's review of project file information and on subsequent discussions with BASF, it appears that additional field work may be necessary to provide the additional information that is required for and directly pertinent to the CMS. The activities associated with scoping and executing this additional field program will probably require that the due dates for the CMS Work Plan and the Draft CMS Report be extended. Parsons ES is in the process of developing a proposed scope of work for this additional work. The extent (and duration) of the field activities will directly impact the date for the submittal of the Draft CMS Report, since the information gathered from the field activities will be required to execute the CMS evaluation and decision process. The BASF project manager Mr. Bruce Roberts, and the Parsons ES project manager Ms. Mona Sutherland, will initiate discussions with the USEPA Region V RPM Ms. Diane Sharrow, to discuss these issues and gain USEPA approval on the proposed changes. This discussion is anticipated to occur during the second week of August 1998.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

- No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

- No key project personnel changes have occurred during this period.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

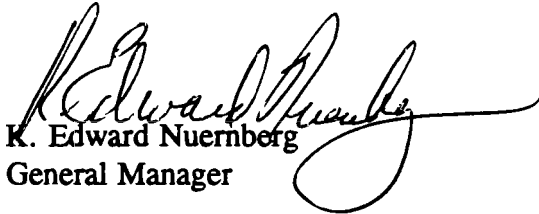
- Parsons ES will (1) develop the scope of work for the proposed additional field activities relative to the CMS, (2) participate in discussion with BASF and USEPA on the proposed field activities and the resulting amendment to the CMS project schedules, and (3) begin work outlining the contents of the CMS Work Plan.

**3b. Anticipated Problems and Proposed Resolutions**

- No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

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**PROGRESS REPORT NO. 53**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD July 1 Through July 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty second monthly progress report to EPA on July 6, 1998.

BASF completed reviewing bids from consultants for the CMS Work Plan and selected Parsons Engineering.

A Records Agreement was executed with Parsons.

BASF personnel collected one round of ground water elevation measurements in monitoring wells.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have been completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 52 was included with the July 16, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.



**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the July 16, 1998 Community Advisory Panel (CAP) meeting minutes.
2. A purchase order will be sent to Environmental Standards Inc. to address final EPA comments associated with data validation.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There was a brief telephone conversation between Ms. Diane Sharrow of the EPA and Mr. Bruce Roberts of BASF Corporation on July 1 concerning timing for the CMS work plan.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 04**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: July 1 Through July 31, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- BASF prepared an outline for a revised scope of work for the treatability studies.
- BASF met with representatives of HLA and Cytec on July 22 to discuss the revised scope of work.
- HLA began working on a Work Plan and Quality Assurance Plan.
- There has been no progress on reclamation of the AOC 7C area.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF will continue pursuing a contractual relationship with Cytec Laboratories. Once the contract is in place, the lab will acquire representative samples and begin the bench-scale tests.
- BASF will solicit proposals for reclamation work at the AOC 7C area.

This Report was completed by:

**BASF Corporation**

  
K. Edward Nuernberg  
General Manager

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 355 729 004**

August 6, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

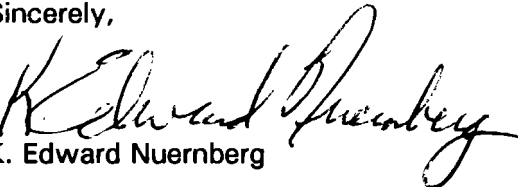
Subject: Monthly Progress Report No. 53  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 53 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1998. Also attached are the monthly AOC 4/AOC 7C Reclamation Report No. 04 for the land reclamation project and CMS Monthly Progress Report No 2.

Should you need additional information please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg

Attachments - Progress Reports  
z:\zword\admin\prgres53.kb

cc: B. Roberts - BASF  
D. Marian - QST  
M. Sutherland - PES  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

## **CMS MONTHLY PROGRESS REPORT NO. 1**

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<b>Project:</b>	Corrective Measures Study for the BASF Wyandotte North Works Facility 1609 Biddle Avenue Wyandotte, Michigan 48192
<b>Respondent Project Coordinator:</b>	Bruce D. Roberts, BASF Corporation
<b>Parsons ES Project Manager:</b>	Mona D. Sutherland
<b>Reporting Period:</b>	June 1 through June 30, 1998
<b>Date of Report:</b>	July 2, 1998

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### **1. PROJECT ACTIVITIES DURING THIS REPORTING PERIOD**

#### **1a. Work Performed, Significant Developments, and Percentage of the CMS Completed**

- Parsons Engineering Science, Inc. (Parsons ES) was selected by BASF to perform the Corrective Measures Study (CMS) for the site. The project will be managed out of the Parsons ES, Oak Brook, Illinois office. The Parsons ES Project Manager is Ms. Mona D. Sutherland.
- On June 25, 1998, the BASF Project Coordinator participated in introductory discussions with Parsons ES as part of the CMS project initiation activities. It was agreed during this meeting to request that the CMS project schedule commence as soon as possible.
- The estimated percent completion of the CMS at the end of this reporting period is 0.5 percent.

#### **1b. Summary of Changes Made to the CMS**

- There have been no changes made to the CMS.

#### **1c. Summary of Contacts with State Government, Local Community Representatives, or Public Interest Groups**

No contacts occurred during this period.

#### **1d. Problems/Issues Encountered and Resolutions**

No major issues or problems were encountered during this period.

**1e. Sampling, Analytical, and Field Activities and Summary of Findings**

No sampling or field activities related to the CMS scope of work have occurred during this period; therefore, no analytical or field data have been generated.

**1f. Key Project Personnel Changes**

As stated previously, Parsons ES was selected by BASF to perform the CMS for the site. The project will be managed out of the Parsons ES, Oak Brook, Illinois office. The Parsons ES Project Manager for the CMS is Ms. Mona D. Sutherland.

**2. DELIVERABLES/REPORTS GENERATED DURING THIS REPORTING PERIOD**

No deliverables or reports associated with the CMS have been generated during this period.

**3. ANTICIPATED ACTIVITIES DURING THE NEXT REPORTING PERIOD**

**3a. Anticipated Work**

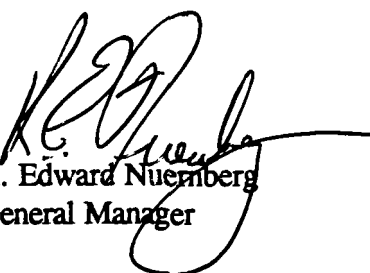
Parsons ES will (1) perform the necessary tasks to become familiar with the project and the findings of the RCRA Facility Investigation, (2) commence work to update the Current Conditions Report, and (3) begin work associated with the preparation of the CMS Work Plan.

**3b. Anticipated Problems and Proposed Resolutions**

No problems are currently anticipated for the next reporting period.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

**PROGRESS REPORT NO. 52**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD June 1 Through June 30, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fifty first monthly progress report to EPA on June 5, 1998.

BASF completed reviewing bids from consultants for the CMS Work Plan and selected Parsons Engineering.

A copy of the Consent Order was sent to Parsons within 14 days of their being awarded the bid and a Records Agreement was also sent to them to execute.

QST began working on report revisions. Some revisions are dependent upon ESI's revisions.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have been completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 51 will be included with the July 16, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the July 16, 1998 Community Advisory Panel (CAP) meeting minutes.
2. A request will be sent to Environmental Standards Inc. to address final EPA comments associated with data validation.
3. Parsons will begin working on the CMS.
4. BASF's consultants will continue addressing the final EPA comments.
5. QST will collect one round of ground water elevation measurements in monitoring wells.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with EPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuerberg  
General Manager

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## **AOC 4/AOC 7C RECLAMATION REPORT NO. 03**

### **BASF CORPORATION WYANDOTTE, MICHIGAN**

**Reporting Period: June 1 Through June 30, 1998**

This monthly Progress Report is submitted for the BASF-initiated, land-reclamation project phase of the work. This Report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

- Received proposals from selected consultants. The proposals describe performance of bench-scale tests to evaluate steam-enhanced removal of the tarry materials from AOC 4.
- Two consulting firms met with BASF representatives to clarify their proposals and further describe their capabilities.
- BASF reclamation team members selected Cytec Laboratories to conduct bench-scale tests. The lab will perform test to evaluate three separate technologies. Briefly, the technologies are: Freeze and Excavate; Stabilize in place; and Steam extraction.
- BASF reclamation team members selected Thomas McGourty, Manager of Site Ecology Services Department, to be the Project Manager for the AOC 4 reclamation project.
- There has been no progress on reclamation of the AOC 7C area.

#### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

- BASF is pursuing a contractual relationship with Cytec Laboratories. Once the contract is in place, the lab will acquire representative samples and begin the bench-scale tests.
- BASF will solicit proposals for reclamation work at the AOC 7C area. Proposals would follow in August.

This Report was completed by:

**BASF Corporation**

  
K. Edward Nuernberg  
General Manager



K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 355 729 002**

July 6, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

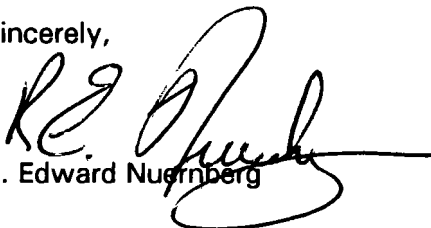
Subject: Monthly Progress Report No. 52  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 52 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 1998. Also attached are the monthly Reclamation Report No. 03 for the land reclamation project and the first CMS Progress Report.

Should you need additional information please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachments - Progress Reports  
z:\zword\admin\pgress52.kb

cc: B. Roberts - BASF  
D. Marian - QST  
M. Sutherland - PES  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

K. Edward Nuernberg  
General Manager  
Wyandotte Site

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**Z 355 729 001**

June 5, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 51  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 51 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 1998. Also attached is the monthly Reclamation Report No. 02 for the land reclamation project.

Should you need additional information please contact us at your convenience.

Sincerely,



K. Edward Nuernberg

Attachments - Progress Report  
z:\zword\admin\prgres51.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 51**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD May 1 Through May 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fiftieth monthly progress report to EPA on May 5, 1998.

BASF received bids from consultants for the CMS Work Plan and associated reports and is currently reviewing them.

BASF received final comments from USEPA concerning the draft RFI Report on May 14.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 50 was included with the May 14, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the July 9, 1998 Community Advisory Panel (CAP) meeting minutes.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD (Continued)**

2. A request will be sent to Environmental Standards Inc. to address final EPA comments associated with data validation.
3. BASF will select a consultant to prepare the CMS Work Plan and begin working on the CMS.
4. BASF will be addressing the final EPA comments.

#### **I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

#### **J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Mr. Roberts and Ms. Sharrow had a brief telephone conversation on May 11 concerning the reclamation projects at AOC 4 and AOC 7C. Ms. Sharrow was to send BASF information concerning potential permitting issues. (These have been received). Ms. Sharrow also stated that the final EPA comments would be issued soon.

Mr. Roberts and Ms. Sharrow had a telephone conversation on May 29 concerning the final comments. Mr. Roberts requested an electronic version of the comments which will be sent to BASF via E-Mail. Mr. Roberts proposed that BASF submit a draft response to the comments because some of the data validation issues concern interpretation of SOPs; Ms. Sharrow agreed with this approach. Ms. Sharrow verified only changed pages of the data validation reports need to be submitted. Mr. Roberts asked if EPA accepted BASF's decision tree to determine which analysis to accept when the sample was re-analyzed. Ms. Sharrow said that EPA accepted the decision tree. Mr. Roberts asked what the implications would be if BASF chose a different consultant for the CMS work. Ms. Sharrow stated that the suggested consultant would have to be approved by EPA, and that a consultant qualification package would have to be submitted to EPA. Mr. Roberts asked if the corrections to the CCR should be made to the CCR or included with the CMS Report. Ms. Sharrow stated that the changes should be submitted as revised pages to the CCR, and that a revision footnote should be noted on those pages.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

## **AOC 4/AOC 7C RECLAMATION REPORT NO. 02**

**BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD May 1 Through May 31, 1998**

This monthly Progress Report is submitted for the BASF initiated land reclamation project phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF requested bids from consultants to perform additional testing of materials from AOC 4 to evaluate steam flooding. A summary of the RFP is attached.

BASF received bids from consultants for performing bench scale testing of materials from AOC 4; these are currently being evaluated.

### **B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

BASF will finish evaluating the first group of proposals and select a consultant.

BASF will begin evaluating the proposals associated with the steam flooding option.

BASF will request proposals for the AOC 7C reclamation project.

This progress report will be included with the July 9, 1998 Community Advisory Panel (CAP) meeting minutes.

This report was completed by:

**BASF CORPORATION**



**K. Edward Nuernberg  
General Manager**

**Attachment**

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**AOC 4/AOC 7C RECLAMATION REPORT NO. 01**

**BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD April 1 Through April 30, 1998**

This monthly Progress Report is submitted for the BASF initiated land reclamation project phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF requested bids from consultants to perform bench scale testing of materials from AOC 4. A summary of the RFP is attached.


**B. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

BASF will receive proposals from consulting firms and begin to evaluate the proposals. The two sets of proposals are to 1) prepare a CMS Work Plan and 2) perform bench scale testing on materials from AOC 4. Selection of a consultant may occur during May 1998, but probably will occur in June.

This progress report will be included with the May 14, 1998 Community Advisory Panel (CAP) meeting minutes.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

Attachment

z:\zword\admin\reclam01.kb

**BENCH SCALE CONSULTING AND TESTING SERVICES  
NORTH TAR PIT  
BASF CORPORATION, WYANDOTTE, MICHIGAN**

**SCOPE OF WORK**

BASF Corporation's goals are (1) to ensure the tarry by-products in this area will not be a source of contamination to surface water, groundwater, or soil and (2) to ensure new structures and facilities can be built on the land. The product at completion of this phase will be construction plans and specifications for pilot scale testing. BASF wishes to have remedial construction completed by April 1, 1999.

BASF envisions the work will be divided into several parts. In summary, the parts are:

- \* Collecting additional field data (as necessary),
- \* Preparing work plans for the various tests,
- \* Conducting treatability tests,
- \* Conducting bench scale tests, and
- \* Preparing the plans and specifications for the pilot test.

**Preliminary performance criteria** -- At this writing, BASF considers the following performance criteria as acceptable for the final product that will remain in the North Tar Pit:

- \* Unconfined compressive strength of not less than 30 psi,
- \* Permeability of not more than  $1.0 \times 10^{-5}$  cm/sec,
- \* Leachate concentrations not to exceed those listed at 40CFR261.24 (the Toxicity Characteristics).

BASF plans to build on this site in the future; therefore, the physical properties of the ground after completing the work must be conducive to underground construction, driving piles, etc.

**Additional data collection and field work** -- Consultant will be responsible for collecting adequate, representative samples of materials to be used during all tests.

**Prepare Work Plan and Conduct Treatability Evaluations** -- Identify and evaluate candidate reagent mixtures capable of: (1) improving the bearing strength of the treated materials, (2) reducing the mobility of chemicals to acceptable levels, and (3) eliminating the buoyancy of the tar.

**Prepare Work Plan and Conduct Bench Scale Tests** -- Test the untreated and treated materials and select an optimal mixture and method for mixing.

**Quality Assurance Plan** -- The plan will describe the methods for ensuring the treated materials meet performance criteria. The plan will define the types and purposes of testing, the methods to be followed (i.e., ASTM, EPA), the frequency, and the acceptance criteria. If statistical evaluations of data will be collected and evaluated, the procedures and justifications must accompany the plan.

**Prepare Work Plan and Specifications for Pilot Scale Test** -- All procedures needed for final remedial construction will need to be included in the work plan for the pilot scale test. In addition to the actual performance of the remedial construction, the procedures and topics covered in this plan will include: air monitoring; odor, vapor, and particulate mitigation; groundwater management; storm water management; quality assurance/quality control; site access and security; project management; data management; and waste management.

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 351

April 6, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 49  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

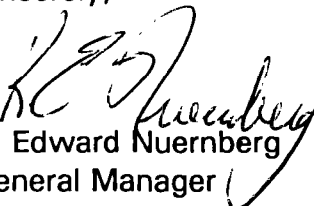
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 49 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 1998.

Also attached are drawdown elevation data for piezometers PE2NA, PE13NB, and PE14NC that were sent to Mr. Steve Phillips on March 11.

Should you need additional information please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg  
General Manager

z:\zword\admin\progres49.kb

Attachment - Progress Report & data

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library



**PROGRESS REPORT NO. 49**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD March 1 Through March 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty eighth monthly progress report to EPA on March 6, 1998.

The data requested by TechLaw concerning the drawdown elevations for piezometers PE2NA, PE13NB, and PE14NC were sent to Mr. Steve Phillips on March 11.

A meeting with USEPA to discuss the draft RFI Report was held on March 16.

BASF requested a response from Quanterra concerning a draft EPA comment.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 48 was included with the April 23, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the April 23, 1998 Community Advisory Panel (CAP) meeting minutes.
2. A request will be sent to Environmental Standards Inc. to address draft EPA comments associated with data validation.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Mr. Roberts had a telephone conversation with Ms. Sharrow on March 2 concerning the March meeting, Trenton Channel sediments, and additional data TechLaw had requested. Mr. Roberts stated that the additional data had been sent directly to Mr. Steve Phillips.

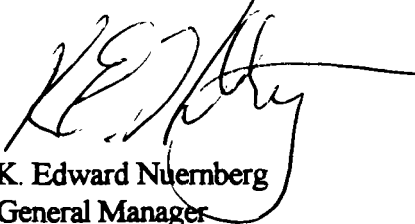
A meeting was held at Northworks on March 16 to discuss the draft RFI report, draft USEPA comments, timetable for the CMS/CMI, and proposed reclamation projects. Representatives from QST were also at the meeting. Ms. Sharrow stated that she hoped to issue final EPA comments in a few months.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**



K. Edward Nuernberg  
General Manager

Pump Test Drawdown (ft) for Adjacent Piezometer PE2NA

Time (min)	Drawdown (ft)
0	-0.012
1	-0.006
2	0.028
3	0.076
4	0.136
5	0.19
6	0.244
7	0.294
8	0.342
9	0.383
10	0.428
20	0.732
30	0.944
40	1.097
50	1.223
60	1.322
70	1.36
80	1.407
90	1.48
100	1.553
200	1.921
300	2.035
400	2.08
500	2.127
600	2.159
700	2.175
800	2.175
900	2.184
1000	2.197
2000	2.222
2524	2.203

Pump Test Drawdown (ft) for Adjacent Piezometer PE13NB

Time (min)	Drawdown (ft)
0	0
1	0
2	0.003
3	0.006
4	0.013
5	0.019
6	0.029
7	0.035
8	0.041
9	0.051
10	0.057
20	0.14
30	0.228
40	0.314
50	0.393
60	0.469
70	0.546
80	0.615
90	0.679
100	0.739
200	1.256
300	1.605
400	1.729
401	1.729
500	1.846
600	1.947
700	1.986
800	2.014
900	2.046
1000	2.068
2000	2.198
2576	2.198

Pump Test Drawdown (ft) for Adjacent Piezometer PE14NC

Time (min)	Drawdown (ft)
0	0.009
1	0.009
2	0.012
3	0.012
4	0.022
5	0.022
6	0.025
7	0.031
8	0.034
9	0.038
10	0.038
20	0.069
30	0.098
40	0.13
50	0.155
60	0.177
70	0.206
80	0.237
90	0.241
100	0.25
200	0.307
300	0.348
400	0.371
500	0.383
600	0.39
700	0.428
800	0.459
900	0.463
1000	0.459
1398	0.488

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
Z 355 729 000

March 6, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 48  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 48 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 1998.

Should you need additional information please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg  
General Manager

Attachment

z:\zword\admin\prgres48.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 48**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD February 1 Through February 28, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty seventh monthly progress report to EPA on February 3, 1998.

Under the direction of site personnel, seven additional Keckpunch borings were advanced near AOC 4.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 47 will be included with the April 2, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the April 2, 1998 Community Advisory Panel (CAP) meeting minutes.
2. A meeting to discuss the RFI report is scheduled for March 16.

#### **I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

#### **J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Mr. Roberts had a telephone conversation with Ms. Sharrow on February 9 concerning specific items to be discussed at the March meeting. Mr. Roberts sent a draft agenda to Ms. Sharrow.

Mr. Roberts received a fifteen page fax from Ms. Sharrow on February 27. It contained a revised draft agenda, a data validation report, split sample results, and some information from MDEQ concerning sediments.

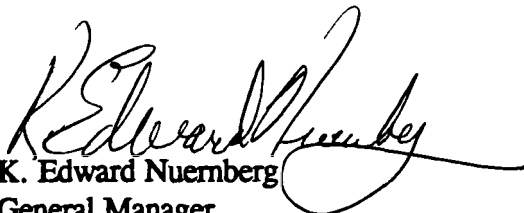
During the February 9 conversation, Ms. Sharrow mentioned a newspaper article that she was given. It stated that the city of Wyandotte was interested in a brownfield site on Mulberry Street near Biddle Ave. BASF's Mr. Jack Lanigan called the City Engineer and determined that the property in question was located at the corner of Third and Mulberry which is about three blocks west of Biddle.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager



File

**BASF**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**P 633 102 349**

February 3, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-9J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 47  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 47 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 1998.

Should you need additional information please contact us at your convenience.

Sincerely,

  
K. Edward Nuernberg  
General Manager

z:\zword\admin\prgres47.kb  
Attachment

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

## **PROGRESS REPORT NO. 47**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD January 1 Through January 31, 1998**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty sixth monthly progress report to EPA on January 7, 1998.

A letter of errata for the RFI Report was submitted to USEPA on January 22.

Under the direction of site personnel, five additional borings were advanced in AOC 4 to make a visual determination of the thickness of the tar.

#### **B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress Report No. 46 was included with the January 29, 1998 Community Advisory Panel (CAP) meeting minutes.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **G. CHANGES IN THE KEY PERSONNEL**

There was one change in personnel. Mr. Don Yarborough, the Wyandotte Site Manager, was transferred to England and has been replaced by Mr. Ed Nuernberg.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the January 29, 1998 Community Advisory Panel (CAP) meeting minutes.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

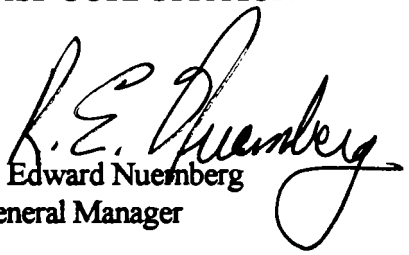
Mr. Roberts left a telephone message for Ms. Sharrow requesting dates for a meeting to discuss the draft report.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**

  
K. Edward Nuernberg  
General Manager

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**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**P 633 102 348**

January 7, 1998

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 46  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 46 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 1997.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report  
z:\zword\admin\prgres46.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 46**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD December 1 Through December 31, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty fifth monthly progress report to EPA on December 15, 1997.

QST completed work on the draft RFI report.

The draft RFI Report was submitted to USEPA.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 45 will be included with the January 29, 1998 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the January 29, 1998 Community Advisory Panel (CAP) meeting minutes.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work has been completed.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

z:\zword\admin\prgres46.br

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**P 633 102 347**

December 15, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 45  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

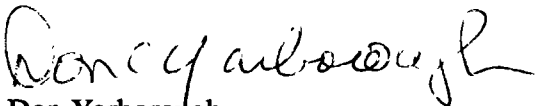
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 45 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 1997.

I apologize for the lateness of this monthly progress report; Mr. Roberts had forgotten all about the progress report. He was very involved with the draft RFI report and then he was conducting an environmental audit at one of our facilities during the week of December 1.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report

z:\zword\admin\prgres45.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

1609 Biddle Avenue, Wyandotte, Michigan 48192 (313) 246-6100

**PROGRESS REPORT NO. 45**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD November 1 Through November 30, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty forth monthly progress report to EPA on November 6, 1997.

QST continued working on the RFI report.

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 44 was included with the November 13, 1997 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.



**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the January 15, 1997 Community Advisory Panel (CAP) meeting minutes.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

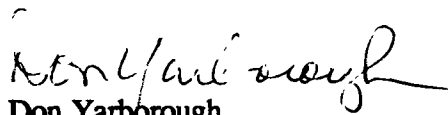
BASF received a time extension from USEPA for submitting the RFI report

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule for completing the RFI report is lagging behind the project schedule. A request for a time extension was requested.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

z:\zword\admin\progres45.br

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**P 633 102 346**

November 6, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

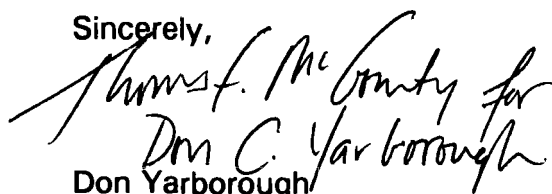
Subject: Monthly Progress Report No. 44  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 44 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 1997.

Should you need additional information please contact us at your convenience.

Sincerely,

A handwritten signature in cursive script, appearing to read "Don C. Yarborough".

Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report

z:\zword\admin\prgres44.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 44**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD October 1 Through October 31, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty third monthly progress report to EPA on October 6, 1997.

QST continued working on the RFI report.

BASF requested a time extension from USEPA for submitting the RFI report

**B. WORK COMPLETED**

All field work, analytical work, and data validation work have completed for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 43 will be included with the November 13, 1997 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

QST's Mr. Jim Kountzman is replacing their Mr. Stephen Clough for risk assessment.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the November 13, 1997 Community Advisory Panel (CAP) meeting minutes.
2. QST will continue working on the RFI report.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

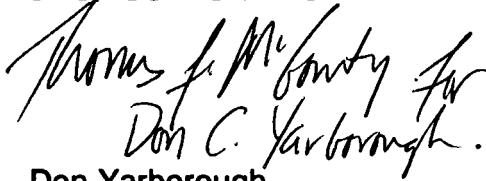
There was a brief telephone conversation between Mr. Bruce Roberts with and Ms. Diane Sharrow with USEPA on October 27 concerning a time extension for submitting the RFI report.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule for completing the RFI report is lagging behind the project schedule. A request for a time extension was requested.

This report was completed by:

**BASE CORPORATION**

A handwritten signature in black ink, appearing to read "Thomas J. McFadyen for Don C. Yarborough".

Don Yarborough  
Wyandotte Site Manager

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
P 633 102 344

October 6, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 43  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 43 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 1997.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report  
z:\zword\admin\prgres43.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 43**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD September 1 Through September 30, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty second monthly progress report to EPA on September 4, 1997.

QST continued working on the RFI report.

ESI submitted validated data reports to BASF for two sampling events.

**B. WORK COMPLETED**

Quanterra has completed all of their analytical work for the RFI.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 42 was included with the September 3, 1997 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the November 6, 1997 Community Advisory Panel (CAP) meeting minutes.
2. QST will continue working on the RFI report.
3. ESI will validate the last analytical data from Quanterra.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

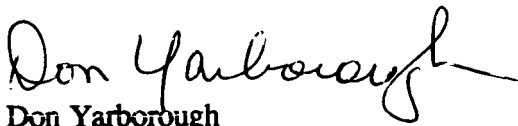
There were no telephone conversations or meetings with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule for completing the RFI report is lagging behind the project schedule. The main reason for the schedule slipping is our continuing to receive validated data through mid September. A request for a time extension is likely.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

z:\zword\admin\pgress43.br

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
**P 633 102 343**

September 4, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

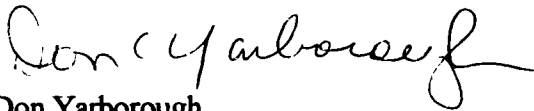
Subject: Monthly Progress Report No. 42  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 42 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 1997.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report  
z:\zword\admin\prgres42.kb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library



## **PROGRESS REPORT NO. 42**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD August 1 Through August 31, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the forty first monthly progress report to EPA on August 4, 1997.

QST continued working on the RFI report.

QST completed the last phase of the evaluation which was to monitor static levels when the entire system was brought back on line.

QST conducted confirmatory sampling for the third Prussian blue area located in the middle of the site.

#### **B. WORK COMPLETED**

The ground water extraction system evaluation was completed.

QST completed the investigation of the suspected Prussian blue area located in the middle of the site.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress Report No. 41 will be included with the September 3, 1997 Community Advisory Panel (CAP) meeting minutes.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the September 3, 1997 Community Advisory Panel (CAP) meeting minutes.
2. QST will continue working on the RFI report.
3. ESI will validate any analytical data that are received from Quanterra.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

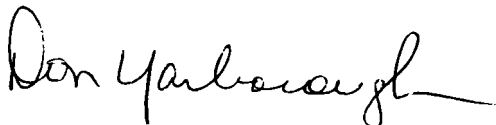
There were no telephone conversations or meetings with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is the same as the project schedule.

This report was completed by:

**BASF CORPORATION**



**Don Yarborough**  
**Wyandotte Site Manager**

**BASF Corporation**

**BASF**

**RECEIVED**  
AUG 08 1997  
**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**  
DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics D...  
U.S. EPA - REGION 5 P 633 102 342

August 4, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

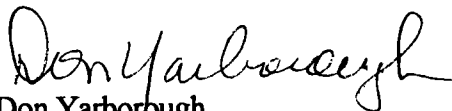
SUBJECT: Monthly Progress Report No. 41  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 41 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1997.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report  
z:\zword\admin\prgres41.kmb

cc: B. Roberts - BASF  
D. Marian - QST  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 41**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD July 1 Through July 30, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fortieth monthly progress report to EPA on July 8, 1997.

BASF completed the planned work on the south ground water extraction system. Operation of the four new replacement extraction wells at the south ground water extraction system began.

QST continued working on the RFI report.

QST completed the baseline water level and background monitoring that is part of the pretest data collection for the extraction well evaluation, the recovery test and the drawdown tests on the individual wells. During the week of August 4, QST will complete the last phase of the evaluation which is to monitor static levels when the entire system is brought back on line.

**B. WORK COMPLETED**

The majority of the ground water extraction system evaluation was completed.

QST delineated the suspected Prussian blue area located in the middle of the site via trenching.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 40 was included with the July 10, 1997 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be included with the August 5, 1997 Community Advisory Panel (CAP) meeting minutes.
3. QST will complete the groundwater extraction system evaluation.
4. QST will continue working on the RFI report.
5. ESI will validate any analytical data that are received from Quanterra.
6. QST will collect confirmatory samples from the suspected Prussian blue area located in the middle of the site.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no telephone conversations or meetings with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 339

May 5, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 38  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 38 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 1997.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarbrough  
Wyandotte Site Manager

Attachment - Progress Report  
z:\zword\admin\prgres38.kmb

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 38**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD April 1 Through April 30, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty seventh monthly progress report to EPA on April 3, 1997.

BASF continued work on the south ground water extraction system.

ESE continued working on the RFI report.

**B. WORK COMPLETED**

No additional work has been completed.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 37 was included with the April 3, 1997 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

RECEIVED

MAY 08 1997

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

DIVISION FRONT OFFICE  
Water & Toxics Division  
U.S. EPA - REGION 5

1. The four wells will be replaced.
2. This progress report will be included with the May 8, 1997 Community Advisory Panel (CAP) meeting minutes.
3. ESE is scheduled to conduct the groundwater extraction system evaluation in June.
4. ESE will continue working on the RFI report.
5. ESI will validate any analytical data that are received from Quanterra.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

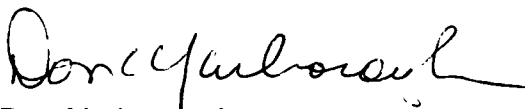
Ms. Diane Sharrow with USEPA left a telephone message for BASF's Bruce Roberts on April 10 concerning the slippage of the schedule. Mr. Roberts left a telephone message for Ms. Sharrow stating that only the schedule for the groundwater extraction system evaluation had slipped and that BASF still planned to submit the RFI Report to USEPA in October 1997.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager



**BASF Corporation**

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

633 102 338

April 3, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

RECEIVED  
APR 08 1997

DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

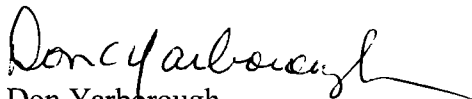
Subject: Monthly Progress Report No. 37  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 37 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 1997.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment - Progress Report

z:\zword\admin\prgres37.pag

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 37**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD March 1 Through March 31, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty sixth monthly progress report to EPA on March 3, 1997.

BASF continued work on the south ground water extraction system.

ESE continued working on the RFI report.

**B. WORK COMPLETED**

No additional work has been completed.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 36 was included with the March 13, 1997 Community Advisory Panel (CAP) meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work. The four wells will be replaced.
2. This progress report will be included with the April 3, 1997 Community Advisory Panel (CAP) meeting minutes.
3. ESE will continue working on the RFI report.
4. ESI will validate any analytical data that are received from Quanterra.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

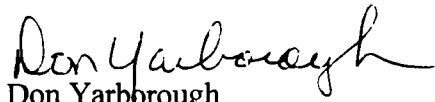
There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

BASF Corporation

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

633 102 337

March 3, 1997

RECEIVED  
MAR 11 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

Subject: Monthly Progress Report No. 36  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

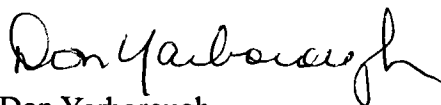
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 36 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 1997.

We have not heard anything from the US Postal Service concerning the delivery date for Progress Report 34.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

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Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

## **PROGRESS REPORT NO. 36**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD February 1 Through February 28, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty five monthly progress report to EPA on February 4, 1997.

BASF continued work on the south ground water extraction system.

ESE continued working on the RFI report.

#### **B. WORK COMPLETED**

No additional work has been completed.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress Report No. 35 will be included with the March 13, 1997 C.A.P. meeting minutes.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work. The four wells will be replaced.

2. This progress report will be included with the March 13, 1997 Community Advisory Panel (CAP) meeting minutes. The February meeting was cancelled.
3. ESE will continue working on the RFI report.
4. ESI will validate any analytical data that are received from Quanterra.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

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BASF Corporation

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 335

February 4, 1997

RECEIVED  
FEB 10 1997

DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 35  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 35 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 1997.

We are having the US Postal Service investigate the delivery date for Progress Report 34.

Should you need additional information please contact us at your convenience.

Sincerely,

*Don C. Yarborough*

Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

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## **PROGRESS REPORT NO. 35**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD January 1 Through January 31, 1997**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty fourth monthly progress report to EPA on January 8, 1997, but it may not have been delivered in a timely fashion. USEPA did not acknowledge receipt of the progress report until January 22.

BASF continued work on replacing the vacuum piping for the south ground water extraction wells.

ESE continued working on the RFI report.

#### **B. WORK COMPLETED**

The installation of the main vacuum line to the south extraction well area is complete.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress Report No. 34 was included with the January 9, 1997 C.A.P. meeting minutes.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.



**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work.
2. This progress report will be included with the March 1997 Community Advisory Panel (CAP) meeting minutes. The February meeting was canceled.
3. ESE will continue working on the RFI report.
4. ESI will validate any analytical data that are received from Quanterra.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were two telephone messages left with Ms. D. Sharrow (USEPA) by B. Roberts (BASF) concerning Progress Report 34.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**

*Don C. Yarborough*  
*Don C. Yarborough*

Don Yarborough  
Wyandotte Site Manager

bdr

**BASF Corporation**

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 334

January 7, 1997

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 34  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 34 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 1996.

Also attached is a summary of changes that have been made as a result of EPA's conditional approval.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

z:\zword\admin\progres34.kw  
Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 34**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD December 1 Through December 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty third monthly progress report to EPA on December 3, 1996.

Boyd Arthurs completed all of the field work for the survey of wells, soil borings, and sampling points.

ESE conducted quarterly well sampling on December 17 through 20.

ESI continued validating the laboratory data; BASF continued receiving the validated data.

BASF continued work on replacing the vacuum piping for the south ground water extraction wells.

ESE continued working on the RFI report.

BASF submitted a listing of what changes Quanterra will and will not make and when they will make the changes with this report.

**B. WORK COMPLETED**

The scheduled quarterly well sampling activities were completed.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress Report No. 33 was included with the December 05, 1996 C.A.P. meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work.
2. This progress report will be included with the January 9, 1997 Community Advisory Panel (CAP) meeting minutes.
3. ESE will continue working on the RFI report.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no discussions or meetings with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

z:\zword\admin\progres34.kw

SUMMARY OF RESPONSES TO EPA's LETTER DATED MARCH 11, 1996

EPA letter dated March 11, 1996 with attachments		DATE OF	
ITEM #	SUBJECT	BASF RESPONSE	RESPONSE
1	Data Validation	April 12, 1996	QAPP Section 3.2.3 revised as requested.
2	Incorporation of Lab Audit Comments (D. Payne)		
I	Introduction		No response required.
II.A.	OPPs	May 17, 1996	OPPs have been deleted from QAPP.
II.B.R.	1,4-dioxane	May 17, 1996	1,4-dioxane added to Method 8270.
II.C.R1.	Aramite & p-phenylene diamine need not be reported	May 17, 1996	Aramite and p-phenylenediamine deleted from Method 8270.
II.C.R2.	Change hexachlorophene to Method 8150	May 17, 1996	Hexachlorophene added to Method 8150.
II.C.R1.	Keep pentachlorophenol as part of both Methods 8150 & 8270	May 17, 1996	Pentachlorophenol kept as part of Methods 8150 and 8270.
II.C.R2.	Dinoseb	May 17, 1996	Dinoseb has been removed from Method 8150 and added to Method 8270.
II.D.1.	cis 1,2-dichloroethene	May 17, 1996	Cis 1,2-dichloroethene has been added to Method 8240 (already part of Method 8260).
II.D.2.	a-chlordane & g-chlordane	May 17, 1996	a-chlordane and g-chlordane have been added to QAPP TABLE 7-4.
III.A.1.	Mercury in soil/water is acceptable	May 17, 1996	No response required.
III.A.2.	Sulfide in water is acceptable	May 17, 1996	No response required.
III.A.3.	Extraction of waters & soils for Methods 8270 & 8080 is acceptable	May 17, 1996	No response required.
III.A.4.	Pesticide/PCBs in soil/water (SOP LM-WALN-4060) is acceptable	May 17, 1996	Only the revised corporate SOP CORP-GC-0001 will be used.
III.A.5.	Propylene oxide & propylene glycol method is acceptable	May 17, 1996	No response required.
III.A.6.	GFAA analysis will not be used	May 17, 1996	Lab SOP NC-MT-0002 is no longer required for the RFI.
III.B.R1.	Use SOP NC-MT-006 & assoc. sample prep for metals analysis	May 17, 1996	Representative soil samples will be dried and homogenized.
III.B.R2.	Utilize ICP Trace for certain elements	May 17, 1996	ICP Trace will be used for As, Pb, Se, Ti, and Sb in water and As, Se, Ti, and Sb in soils.
III.B.R3.	Revise QAPP tables to reflect above conditions	May 17, 1996	QAPP tables have been rewritten to reflect recommendations III.B.R1 and III.B.R2.
III.B.R4.	Sb & Cr contamination	May 17, 1996	It has been verified that contamination is from the vendor and does not impact the data.
III.B.R5.	Analyze NIST SRM soils 2709, 2710, 7 2711	May 17, 1996	QES has analyzed NIST soils SRMs 2709, 2710, and 2711 and sent results to EPA.
III.B.R6.	ICP Trace for Sb	May 17, 1996	Antimony will be analyzed by ICP Trace.
III.B.R7.	Cyanide test procedure	May 17, 1996	QES modified their test procedure.
III.C.1.a.R1.	Rewrite SOP tables so that SOP is specific to Appendix IX	May 17, 1996	The SOP tables not rewritten so that each SOP. Tables 18 & 19 added to list retention times.
III.C.1.a.R2.	Corporate standards should list any non Appendix IX volatiles	May 17, 1996	Data validation is not concerned with non-Appendix IX compounds.
III.C.1.b.R.	Reference spectra for volatiles	May 17, 1996	An addendum has been added to the corporate SOP.
III.C.1.c.R.	Re-evaluate conc. of water miscible volatiles	May 17, 1996	QES has added addendum Tables 1 and 3 giving revised reporting limits for 25 ml aliquots.
III.C.1.d.R.	Data validation of water miscible volatiles for Methods 8240/8260	---	Data validation process will take into account water miscible volatiles.
III.C.1.e.R1.	Separate acetonitrile and allyl chloride into separate calibration stds.	May 17, 1996	Acetonitrile and allyl chloride have been separated into separate calibration standards.
III.C.1.e.R2.	Re-evaluate calibration std./ reporting limits for acrolein & propionitrile	May 17, 1996	The calibration standard concentrations used for acrolein and propionitrile have been revised.
III.C.1.e.R3.	Re-evaluate mass spectral interferences of chloropropane & e-acetate	May 17, 1996	The concentration of ethyl acetate in the calibration standards has been reduced.
III.C.1.f.R1.	Different experimental reference spectrum is needed for DBCP	May 17, 1996	See III.C.1.e.R1. Also, std calibration levels have been revised.
III.C.1.f.R2.	Quant ion other than 39 for DBCP	May 17, 1996	The corporate SOP has been revised to use ions 157 or 155 when quantifying 1,2-dibromo-3-chloropropane.
III.C.1.h.R1.	Isomers of dichloropropane	May 17, 1996	Not a recommendation.
III.C.1.h.R2.	Focused TIC approach	May 17, 1996	TIC search is specified in corporate SOP CORP-MS-0002.
III.C.1.h.R3.	Not a recommendation	May 17, 1996	Not a recommendation.
III.C.1.h.R4.	Authentic stds of chloropropenes, chloropropanes, & dichloropropenes	---	Authentic standards will be used.
III.C.2.a.R1.	OPPs	May 17, 1996	OPPs have been deleted from the QAPP tables.
III.C.2.a.R2.	5-nitro-o-toluidine	May 17, 1996	The correct nomenclature for 5-nitro-o-toluidine will be used.
III.C.2.a.R3.	2-picoline and proprietary compound No. 13	May 17, 1996	Proprietary compound No. 13 is no longer used in Method 8270.
III.C.2.a.R4.	Mass spectra and extracted ion chromatographs for p-phenylenediamine	May 17, 1996	QES has removed this constituent from the list of target analytes.
III.C.2.a.R5.	Delete hexachlorophene from Method 8270 and add to Method 8150	May 17, 1996	Hexachlorophene has been deleted from Method 8270 and added to Method 8150.
III.C.2.a.R6.	Delete Aramite	May 17, 1996	Aramite has been deleted.
III.C.2.a.R7.	Doublet GC peak for bis chloroisopropyl	May 17, 1996	The doublet peak for Bis(2-Chloroisopropyl) ether no longer exists in the calibration standard.
III.C.2.a.R8.	Aniline and phenol co-elute	May 17, 1996	Sentences added to SOP CORP-MS-0001 concerning phenol and aniline.

## SUMMARY OF RESPONSES TO EPA's LETTER DATED MARCH 11, 1996

EPA letter dated March 11, 1996 with attachments		DATE OF	
ITEM #	SUBJECT	BASF RESPONSE	RESPONSE
III.C.2.a.R9.	Reporting of m & p-cresols and diphenylamine & n-nitrosodiphenylamine	May 17, 1996	Should either constituent be detected, the project narrative will notify the client that coelution exists.
III.C.2.a.R10	Zinophos or Thionazin	May 17, 1996	OPPs have been deleted from the project.
III.C.2.a.R11	Secondary ions for symmetrical trinitrobenzene	May 17, 1996	These ions have been added to the mass spectral library for symmetrical trinitrobenzene.
III.C.2.a.R12	Semi-volatile compounds of poor sensitivity	---	Data validation will take into account compounds of poor sensitivity.
III.C.3.R1.	Include hexachlorophene in Method 8150	May 17, 1996	Hexachlorophene has been deleted from Method 8270 and added to Method 8150.
III.C.3.R2.	Decrease conc. of surrogate and matrix spikes	May 17, 1996	The facility SOP will be used for herbicide extractions.
III.C.3.R3.	Establish control limits for surrogate spike	May 17, 1996	Acceptance criteria for surrogate spike recoveries are shown in QAPP TABLE 3-2.
III.C.3.R4.	maintain pentachlorophenol in Method 8150	May 17, 1996	Pentachlorophenol will be maintained as a target compound for Method 8150.
III.C.3.R5.	Typo for 2,4-d soil recovery in QAPP TABLE 3-1	May 17, 1996	The typographical error for 2,4-D in QAPP TABLE 3-1 has been corrected.
III.D.1.R.	delete sulfide in soil	May 17, 1996	Sulfide in soil has been deleted from the QAPP.
III.D.2.R.	Poor acceptance criteria for cyanide in TABLE 3-1	May 17, 1996	The cyanide control limits have been revised and are being reviewed by EPA.
III.D.3R.	Use of GFAA	May 17, 1996	Use of GFAA is no longer required by the RFI and its use has been deleted from the QAPP.
III.D.4R.	Herbicide reporting limits	May 17, 1996	The facility SOP will be utilized for organic preparation.
	Use of Revised/Corporate SOPs	May 17 & September 3, 1996	Addendum added to corporate SOPs when specific information is required.
	Revision of SOP Tables	May 17, 1996	SOP TABLES revised as requested.
	Detection Limits	May 17, July 1, & September 3, 1996	QAPP TABLE 7-4 revised.
	PDC Spill Area	May 17, 1996	TIC search is specified in corporate SOP CORP-MS-0002.
	Lab Audit Conditions		
	QAPP approval for Appendix IX semivolatiles		No corrective action required.
	QAPP approval for mercury		No corrective action required.
	QAPP approval for sulfide in water		No corrective action required.
	QAPP approval for Method 8015 for propylene oxide		No corrective action required.
	QAPP approval for Method 8015 for propylene glycol		No corrective action required.
	Update tables in 2 facility SOPs	May 17, 1996	Tables updated as requested.
	Experimental reference spectra	May 17, 1996	Addendum added to corporate SOP.
	Re-evaluate std concentrations for water miscible volatiles	May 17, 1996	Calibration concentrations have been revised.
	Establish conditions to obtain exp. mass spectra	May 17, 1996	Conditions to obtain exp. mass spectra have been established.
	ICP & ICP Trace method 6010A	May 17, 1996	ICP Trace will be used as requested.
	Soils for mercury, cyanide, and metals	May 17, 1996	Soils for mercury, cyanide, & metals will be dried/homogenized.
	Rewrite QAPP Tables to reflect use of NC-MT006	May 17, 1996	SOP has been replaced with corporate SOP CORP-MT-0001.
	NIST SRM soil numbers 2709, 2710, and 2711	September 3, 1996	NIST SRM soil report submitted.
	Method 8150 - establish criteria for surrogate spikes	May 17, 1996	Criteria established in Section 9 of SOP CORP-GC-0001 & QAPP TABLE 3-2.
	Method 8150 - decrease conc. for surrogate & matrix spikes	May 17, 1996	Facility SOP LM-WALN-4110 to be used which contains the correct concentrations.
	Alternative method for 1,4-Dioxane	May 17, 1996	1,4-dioxane to be analyzed by Method 8270B.
	Alternative method for Hexachlorophene	May 17, 1996	Hexachlorophene will be analyzed by Method 8150B.
	Report compounds with Appendix IX results	May 17, 1996	Compounds will be reported with Appendix IX results.
	Report Aramite and p-phenylene diamine as ND & delete OPPs	May 17, 1996	Required changes have been made.
	Delete sulfide in soil	May 17, 1996	Required change has been made.
	Prussian Blue area cyanide	September 3, 1996	Lab SOP revised and addendum added.
	Facility SOP for Method 8150	May 17, 1996	Facility SOP used for the extraction & corp. SOP used for analysis
	Delete SOP CORP-MT-0003	May 17, 1996	Required change has been made.

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JAN 22 1997

DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

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P 633 402 331

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DEC 09 1996  
DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

December 3, 1996

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 33  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 33 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

**PROGRESS REPORT NO. 33**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD November 1 Through November 30, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty-second monthly progress report to EPA on November 4, 1996.

Boyd Arthurs completed the GPS portion of the survey of wells, soil borings, and sampling points.

ESE began the third round of sampling the background wells on November 19.

ESI continued validating the laboratory data; BASF started receiving the validated data.

BASF began work on replacing the vacuum piping for the south ground water extraction wells.

ESE began work on the RFI report.

**B. WORK COMPLETED**

The scheduled monthly background well sampling activities were completed.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There were no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report No. 32 was included with the November 14, 1996 C.A.P. meeting minutes.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**



There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work.
2. This progress report will be included with the December 05, 1996 Community Advisory Panel (CAP) meeting minutes.
3. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.
4. ESE will conduct the quarterly well sampling.
5. Boyd Arthurs will complete the remaining field work for surveying the wells, soil borings, and sampling points.
6. ESE will continue working on the RFI report.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**


Mr. Roberts sent a letter to Ms. Sharrow on November 1 which added a disclaimer to QAPP TABLE 3-1 and 3-2 stating that control limits are subject to change and that the control limits in effect at the time of analyses would be used.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

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NOV 12 1996  
P 633 102 330

November 4, 1996

DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 32  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 32 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra  
B. Wallace - Bacon Memorial Public Library

## **PROGRESS REPORT NO. 32**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD October 1 Through October 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirty first monthly progress report to EPA on October 7, 1996.

BASF submitted revisions to EPA on October 17 for the Health and Safety Plan.

Boyd Arthurs began the GPS survey of wells, soil borings, and sampling points.

ESE began the second round of sampling the background wells on October 28.

ESI continued validating the laboratory data.

Carlo installed a new piezometer on October 3 to replace MN1NA which is associated with the ground water extraction system.

BASF continued work on the ground water extraction system.

#### **B. WORK COMPLETED**

Background well sampling activities were completed on October 29.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

EPA fully approved the QAPP.

#### **D. COMMUNITY RELATIONS**

Progress Report No. 31 will be included with the November 14, 1996 C.A.P. meeting minutes.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work.
2. This progress report will be included with the November 14, 1996 Community Advisory Panel (CAP) meeting minutes.
3. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.
4. The survey of well locations and elevations and sampling locations will be completed.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Mr. Roberts left a telephone message for Ms. Sharrow concerning QAPP approval.

Ms. Davis-Johnson with Quanterra had a discussion with Ms. Sharrow concerning laboratory control limits. It was agreed that a disclaimer could be added to the QAPP stating that control limits are subject to change and that the control limits in effect at the time of analyses would be used.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 329

October 7, 1996

RECEIVED  
OCT 17 1996

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

DIVISION FRONT OFFICE  
Waste, Pesticides & Toxics Division  
U.S. EPA - REGION 5

Subject: Monthly Progress Report No. 31  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 31 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
A. Danford - Quanterra

**PROGRESS REPORT NO. 31**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD September 1 Through September 30, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirtieth monthly progress report to EPA on September 3, 1996.

BASF submitted revisions to EPA for the Health and Safety Plan, the Project Management Plan, the QAPP, the Field SOPs, and the lab SOPs on September 3.

BASF hand delivered a copy of the Pre-investigation Evaluation of Corrective Measures, Public Participation Plan, Project Management Plan, Data Management Plan, Health and Safety Plan, Investigation of Current Conditions, QAPP, Administrative Order of Consent with attachments, applicable Community Advisory Panel meeting minutes, and monthly progress reports to the Bacon Memorial Library in Wyandotte on September 19.

ESE continued site investigation activities.

Delineation of AOC 7 continued.

Delineation of SWMU H began.

The development of the new wells continued and redevelopment of the extraction wells began.

Sampling of wells began.

Additional perimeter samples were collected at AOC 6.

Surface water runoff samples were collected.

A replacement well for well P-35-N was installed.

**B. WORK COMPLETED**

Collection of samples at SWMU H was completed on September 24.

AOC 6 (unsaturated zone source material) has been delineated and perimeter confirmatory sampling was completed, pending laboratory results, on September 24.

Perimeter sampling of AOC 7 was completed on September 5.

All soil sampling activities have tentatively been completed pending analytical results.

Well sampling activities were completed on October 1.

Collection of surface runoff samples was completed.

Well RFIMW-29 was installed as a replacement for well P-35-N; it was located east of well P-35-N.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

Unvalidated laboratory results indicated that the perimeter of AOC 6 was not delineated in two areas, so additional samples were collected.

Initial recovery rates of the existing site wide ground water extraction system wells were lower than expected.

**D. COMMUNITY RELATIONS**

Progress Report Nos. 27, 28, 29 and 30 were included with the September 05, 1996 C.A.P. meeting minutes, to be reviewed by the Community Advisory Panel (CAP) members.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were poor recoveries in the sampling tubes of what is believed to be sediments in SWMU H.

The lower than expected initial recovery rates in the extraction wells will delay the extraction system evaluation.

Well P-35-N was found to be damaged when sampling activities were initiated.

Piezometer PM1NA appears to be damaged; the bailer has to be pushed down a portion of the well.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

*After consultation with ESE personnel, the decision was made to continue the current sampling scheme since the samples submitted to the laboratory will be collected from just above the clay layer.*

Work is in progress to improve the extraction well withdrawal rates. A portion of the wells were acid cleaned. Additional measures will be taken.

A replacement well for well P-35-N was installed.

Piezometer PM1NA will be replaced.

**G. CHANGES IN THE KEY PERSONNEL**

Mr. Tom Himes left Quanterra; his replacement as Project Manager is Ms. Alesia Danford.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue extraction well work.
2. This progress report will be included with the November 07, 1996 Community Advisory Panel (CAP) meeting minutes. The October 1996 meeting was canceled.
3. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.
4. A damaged piezometer associated with the ground water extraction system will be replaced.
5. The survey of well locations and elevations and sampling locations will be completed.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.



**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Mr. John Koehnen with A.T. Kearney was on site on September 11 and 12 to witness sampling activities SWMU H and redevelopment of the extraction wells. He was on site on September 26 to collect well samples from wells RFIMW 15, 16, 2, and 13.

Mr. Roberts left telephone messages for Ms. Sharrow which summarized that week's field work.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule for the extraction well evaluation.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in black ink, appearing to read "Don Yarborough". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 328

September 3, 1996

**RECEIVED**  
SEP 09 1996

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

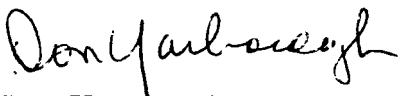
Subject: Monthly Progress Report No. 30  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 30 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 30**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD August 1 Through August 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty ninth monthly progress report to EPA on August 6, 1996.

ESE continued site investigation activities.

ESE found companies that could analyze the samples from AOC 4 that required using ASTM test methods.

BASF obtained a purchase order and records preservation agreement with both Research Technologies International and Testing Engineers & Consultants, Inc. for the AOC 4 analyses.

Quanterra continued working with Mr. David Payne to resolve the SOP, SRM report, and cyanide issues.

Delineation of AOC 7 began.

The development of wells began.

**B. WORK COMPLETED**

The south staff gauge in the river was installed; the installation of staff gauges is complete.

Samples were collected at SWMU E on August 13.

Samples were collected at SWMU G on August 20.

AOC 2 has been delineated and perimeter confirmatory sampling was completed on August 21.

The geoelectrical resistivity survey at AOC 4 was completed on August 8. Confirmatory perimeter borings were completed on August 20. Sampling within the AOC was completed on August 16.

AOC 6 (unsaturated zone source material) has been delineated and perimeter confirmatory sampling was completed on August 15.

Three damaged piezometers associated with the ground water extraction system were replaced.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

The proposed boundary of AOC 2 was not drawn correctly; as shown, it did not include the byproducts plant. The west side of the proposed boundary was re-established on the west side of the engineering trailers.

An area of tar with the anticipated consistency was discovered near the southwest end of AOC 6.

**D. COMMUNITY RELATIONS**

Progress report No. 27 and No. 28 are being included with the August 1996 C.A.P. meeting minutes, to be reviewed by the Community Advisory Panel (CAP) members.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

When obtaining PID and FID readings from material collected in the saturated zone, it was not possible to determine if the readings were from source material or leaching from source material.

The limestone and gravel at the surface of AOC 4 had an effect on the conductivity between the probes and the AOC. Due to the viscous nature of the tar, Testing Engineers & Consultants, Inc. could not conduct the ASTM tests for moisture content, compaction, and strength.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

After consultation with ESE personnel, the decision was made to only look for source material in the unsaturated zone. This decision applied to both AOC 2 and AOC 6.

A small amount of water was poured onto AOC 4 at the probe locations. It will not be possible to analyze the tar at AOC 4 for moisture content, compaction, and strength.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Complete soil sampling activities.
2. Complete the well development/redevelopment work.
3. Begin water sampling activities.
4. BASF will submit the QAPP changes relating to the lab SOP changes and personnel changes.
5. This progress report will be included with the September 5, 1996 Community Advisory Panel (CAP) meeting minutes.
6. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.

#### **I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

#### **J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Quanterra personnel completed discussions on lab issues with Mr. David Payne.

Mr. John Koehnen with A.T. Kearney was on site on August 20 and 21 to witness sampling activities and obtain split soil samples at SWMU G and AOC 2.

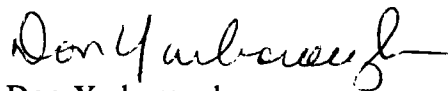
Mr. Roberts left weekly telephone messages for Ms. Sharrow which summarized that week's field work.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is lagging behind the project schedule. The time to characterize the AOCs and SWMUs was greater than anticipated. The project schedule is in the process of being revised.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 327

August 6, 1996

RECEIVED  
AUG 13 1996

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION V

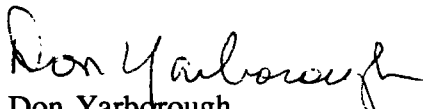
Subject: Monthly Progress Report No. 29  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 29 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
D. Marian - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

## **PROGRESS REPORT NO. 29**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

#### **REPORTING PERIOD July 1 Through July 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty eight monthly progress report to EPA on July 2, 1996.

ESE began site investigation activities.

ESE searched for a company that could analyze the samples from AOC 4 that required using ASTM test methods.

Quanterra continued working with Mr. David Payne to resolve the SOP, SRM report, and cyanide issues.

BASF obtained a purchase order and records preservation agreement with Boyd Arthurs, the surveyor.

BASF submitted a telephone verification letter for the June 27 conversation between Ms. Diane Sharrow and Mr. Bruce Roberts.

#### **B. WORK COMPLETED**

The installation of the twenty eight wells and one piezometer was completed on August 1. The wells have not yet been developed.

SWMU F has been delineated and random sampling within the SWMU was completed on August 2, so work at SWMU F has been completed.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

The thickness of filter cake in SWMU F was not as thick and as uniform as anticipated and the consistency of the tar in AOC 6 was different than expected.

#### **D. COMMUNITY RELATIONS**

Progress Reports No. 27 and No. 28 are being included with the August 1996 C.A.P. meeting minutes, to be reviewed by the Community Advisory Panel (CAP) members.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

SWMU F also contained DBO wastes which were sometimes difficult to visually distinguish from filter cake.

The thickness of filter cake within SWMU F was less than two feet thick in fourteen of seventeen random locations.

The consistency of the tar in AOC 6 was not as anticipated. During the repair work of the extraction system in 1992, a tar with the consistency of roofing tar was encountered. During the current investigation of AOC 6, this type material has not been seen. Also, the natural wetland soils would have the same color as some of the manmade materials of interest.

The use of ten foot step outs at AOC 6 is very time consuming and inefficient.

ESE was not able to find a commercial lab that could conduct all of the ASTM analyses.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

The DBO contains about eight percent iron while the filter cake does not contain any. A HACH test kit for iron is being used, but the procedure has been modified. A drop of liquid from the HACH pillow is placed on the material in question. The spot immediately turns dark purple if iron is present. Also, most of the filter cake will contain filter paper.

After consultation with ESE personnel, the decision was made to decouple the sampling of filter cake from the other materials at SWMU F. New geoprobe borings were made adjacent to the first ones randomly selected and samples of the other materials were collected; areas known to contain at least two feet of filter cake were used to collect filter cake samples for analysis by BNASF.

The main means of determining the presence of tar at AOC 6 shifted from visual to FID and PID readings.

Again after consultation with ESE personnel, the decision was made to increase the step outs to twenty feet for defining the perimeter of AOC 6.



**F. SUMMARIES OF SOLUTION (cont'd)**

The ASTM analyses for AOC 2 will be split up between two companies. Research Technologies International in Livonia, Michigan will conduct the ASTM analysis for BTU value and Testing Engineers & Consultants, Inc. in Troy, Michigan will conduct the remaining ASTM analyses.

**G. CHANGES IN THE KEY PERSONNEL**

Mr. Robert Veenstra, the Project manager for ESE, is leaving ESE effective August 9. He will be replaced by Mr. Douglas Marian who is located in their St. Louis office.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Continue field activities.
2. Resolve all remaining laboratory analysis issues.
3. BASF will submit the QAPP changes relating to the lab SOP changes and personnel changes.
3. This progress report will be presented at the September 5, 1996 Community Advisory Panel (CAP).
4. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.
5. BASF will obtain a purchase order and records preservation agreement with the analytical laboratories of ASTM analyses.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Quanterra personnel continued to discuss lab issues with Mr. David Payne.

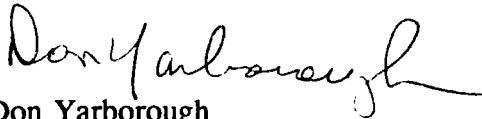
Mr. Roberts left weekly telephone messages for Ms. Sharrow which summarized that week's field work.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The working schedule is still within the project schedule.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in black ink, appearing to read "Don Yarborough", with a stylized flourish at the end.

Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 326

July 2, 1996

**RECEIVED**  
JUL 09 1996

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 28  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 28 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 28**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD June 1 Through June 30, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty seventh monthly progress report to EPA on June 3, 1996.

ESE began site mobilization activities.

Quanterra continued working with Mr. David Payne to resolve the SOP, SRM report, and cyanide issues.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number twenty-seven was not presented to the Community Advisory Panel (CAP) as the June meeting was canceled. This report will be presented at the July 11, 1996 meeting.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Field activities will begin.
2. Resolve all remaining laboratory analysis issues.
3. This progress report will be presented at the July 11, 1996 Community Advisory Panel (CAP).
4. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.
5. BASF will obtain a purchase order and records preservation agreement with the surveyor and analytical laboratory of ASTM analyses.

#### **I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

#### **J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There was one telephone conversations between Ms. Diane Sharrow and Mr. Bruce Roberts on June 27; a separate confirmation will be issued. There were four telephone conversations between Mr. David Payne and Dr. Kathy Hillig concerning laboratory issues. On June 20, Quanterra's Corporate SOP for metals and metals detection limits were discussed. On June 24 and 25, Quanterra's Corporate SOP for metals and SOP for pesticides were discussed. On June 26, Quanterra's SRM report, detection limits, and Prussian Blue cyanide issues were discussed. On June 20 there was a telephone conversation between Mr. D. Payne and Mr. B. Roberts concerning Quanterra's Corporate SOP for metals and cyanide. There were also several discussions between Mr. David Payne and Quanterra personnel.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

bdr

June 3, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 325

**RECEIVED**

JUN 07 1996

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

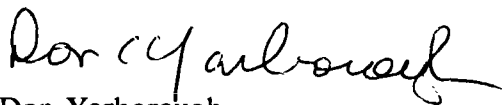
Subject: Monthly Progress Report No. 27  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 27 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 27**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD May 1 Through May 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty sixth monthly progress report to EPA on May 2, 1996.

BASF submitted an additional response to EPA on May 17 for the QAPP changes required by the conditional approval. With the exception of cyanide, all changes required by the conditional approval have been completed.

BASF submitted the QAPP signature sheet for signature, a revised schedule, and ESI's response to Mr. Payne's data validation comments to EPA on May 23.

Quanterra submitted their analytical results of the SRM soils to EPA on May 23.

Quanterra continued working with Mr. David Payne to resolve the cyanide issues.

BASF sent a copy of the Consent Order and obtained a record preservation agreement with Carlo Environmental Technologies.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number twenty six was presented to the Community Advisory Panel (CAP) at a meeting on May 09, 1996.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. This progress report will be presented at the June 06, 1996 Community Advisory Panel (CAP).
2. BASF will submit a listing of what changes Quanterra will and will not make and when they will make the changes.
3. ESE will begin mobilizing at the site.
4. Resolve the Prussian Blue cyanide analysis issue.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were two brief telephone conversations between Ms. Diane Sharrow and Mr. Bruce Roberts. The first conversation was on May 23. Mr. Roberts stated that Quanterra will be using more corporate standards, will be using Update II methods, and some of the SOPs referenced in the Conditional Approval were not being used by Quanterra. Ms. Sharrow said that Mr. Payne had approved Quanterra's procedure for general cyanide analysis (excluding Prussian Blue areas). The second conversation was on May 28. The main topic of discussion was the need to come to an agreement on the Prussian Blue cyanide analysis. Ms. Sharrow said that she had reviewed the submittals; she did not mention any problems with them. She said that EPA needs to give direction to BASF concerning the Prussian Blue cyanide analysis.

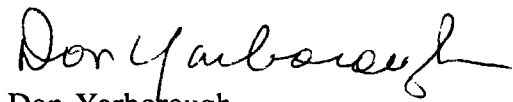


**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in cursive script, appearing to read "Don Yarborough".

Don Yarborough  
Wyandotte Site Manager

bdr

May 2, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 323

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (DRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

RECEIVED

MAY 1 - 1996

OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION V

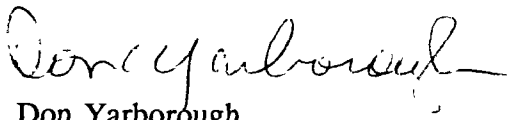
Subject: Monthly Progress Report No. 26  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 26 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 26**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD April 1 Through April 30, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted a partial response to EPA on April 12 for the QAPP changes required by the conditional approval. BASF also requested additional time to complete the laboratory modifications.

Quanterra completed most of the revisions required in the QAPP tables and updating their SOPs.

BASF and Quanterra received cyanide literature from Mr. David Payne (EPA).

Dr. Hillig (BASF) submitted cyanide abstracts from the 1995 Conference on Analysis of Pollutants in the Environment held in Norfolk, VA to Mr. David Payne at his request.

BASF submitted the twenty fifth monthly progress report to EPA on April 2, 1996.

BASF received a response from Ms. Diane Sharrow dated April 18 concerning BASF's April 12 submittal. BASF also received a request from Ms. Sharrow dated April 23 concerning modifications to ESI's data validation SOPs. A copy of the letter was sent to ESI; no response has been received yet.

BASF issued a purchase order to Carlo Environmental Technologies, Inc. for the well drilling activities and a purchase order to Environmental Science & Engineering, Inc. for the soil probing activities.

Quanterra continued working with Mr. David Payne to resolve the cyanide issues.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number twenty five was presented to the Community Advisory Panel (CAP) at a meeting on April 17, 1996.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will send a copy of the Consent Order and obtain a record preservation agreement with Carlo Environmental Technologies.
2. This progress report will be presented at the May 09, 1996 Community Advisory Panel (CAP).
3. BASF will complete the response to EPA's conditional approval. Work will include a list of what changes Quanterra will and will not change and when they will make the changes.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

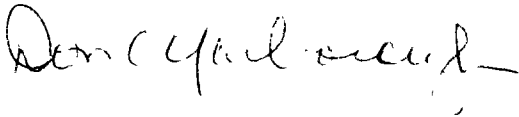
There were continuing discussions between Quanterra personnel and Mr. David Payne (USEPA) concerning the cyanide issues.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in black ink, appearing to read "Don Yarborough", with a stylized flourish at the end.

Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 322

April 2, 1996

**RECEIVED**  
APR 04 1996

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA. REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

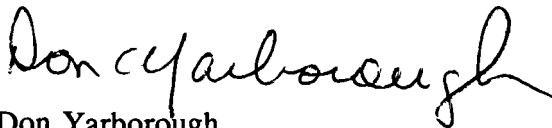
Subject: Monthly Progress Report No. 25  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 25 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

## **PROGRESS REPORT NO. 25**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD March 1 Through March 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF received EPA's conditional approval of the QAPP on March 14 and sent a copy to Quanterra Inc., Environmental Standards, Inc., and Environmental Science & Engineering, Inc.

BASF submitted the twenty fourth monthly progress report to EPA on March 5, 1996.

BASF requested and received clarifications from the bidders and held a pre-award meeting with two of the bidders on March 26. BASF has made a tentative decision to split the well drilling and soil probing work between two bidders.

#### **B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress report number twenty four was presented to the Community Advisory Panel (CAP) at a meeting on March 14, 1996.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will finalize arrangements with the two contractors for the drilling and soil probing services.
2. This progress report will be presented at the April 17, 1996 Community Advisory Panel (CAP).
3. BASF will continue work on responding to EPA's conditional approval. Work will include a list of what changes Quanterra will and will not change and when they will make the changes.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There was a telephone conversation among Dr. Kathy Hillig (BASF), Mr. David Payne (USEPA), and Ms. Diane Sharrow (USEPA) on March 19 to discuss the lab issues. EPA does not need to see the revised lab SOPs but, they must be revised. Revisions will include (1) addition of cis-1,2-dichloroethene to the list of volatile analytes, (2) revision of retention times, (3) revision to the data presentation of reference spectra for the data validator, (4) addition of 1,4-dioxane to the base-neutral method, (5) removal of OPP analytes from methods 8140, 8270, and 8080 lists, (6) running SRM standards for the ICP and Trace instruments, (7) specifying how metal analytes will be determined and reported, and (8) revision of Quanterra corporate SOPs to make them more specific. Other items discussed were the cyanide issues and data validation issues. Mr. David Payne is to send BASF information concerning cyanide analyses.

Dr. Kathy Hillig and Mr. David Payne had a telephone conversation on March 27 concerning the status of the lab issues

Mr. Tom Himes - Quanterra and Mr. David Payne have had several telephone conversations concerning the lab SOPs. Quanterra will use the corporate SOPs and add an addendum to make them more specific. The addendum will be based upon the facility SOPs.

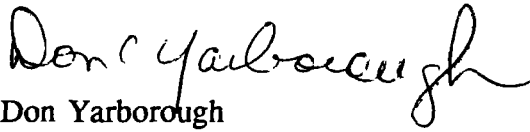


**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in cursive script that reads "Don Yarborough".

Don Yarborough  
Wyandotte Site Manager

bdr

March 5, 1996

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 321

**RECEIVED**

MAR 11 1996

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

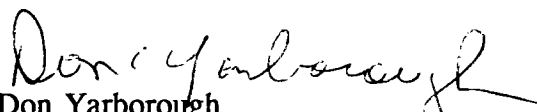
Subject: Monthly Progress Report No. 24  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 24 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 1996.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 24**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD February 1 Through February 29, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty second monthly progress report to EPA on February 02, 1996.

BASF continued reviewing the quotations for drilling services and requested clarifications from the bidders.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number twenty three was presented to the Community Advisory Panel (CAP) at a meeting on February 08, 1996.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will select a contractor for the drilling and soil probing services.
2. This progress report will be presented at the March 14, 1996 Community Advisory Panel (CAP).
3. BASF will begin work on responding to EPA's response if it is received.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

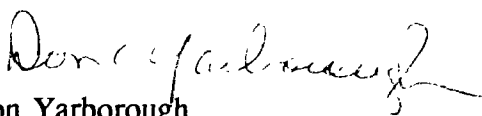
There was a telephone conversation between Mr. Bruce Roberts and Ms. Diane Sharrow - USEPA on February 29. The timing for a response from EPA on the work plans was briefly discussed. EPA anticipates submitting a response to the Work Plan and the Quanterra lab audit a couple of weeks.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 319

February 2, 1996

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 23  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 23 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 1996.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 23**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD January 1 Through January 31, 1996**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty second monthly progress report to EPA on January 02, 1996.

BASF continued reviewing the quotations for drilling services.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress reports number twenty one and twenty two were presented to the Community Advisory Panel (CAP) at a meeting on January 11, 1996.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will select a contractor for the drilling and soil probing services.
2. This progress report will be presented at the February 08, 1996 Community Advisory Panel (CAP).
3. BASF will begin work on responding to EPA's modified comments if they are received.

#### **I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

#### **J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

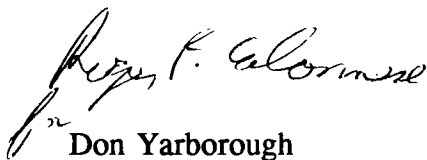
There was a telephone conversation between Mr. Bruce Roberts and Ms. Diane Sharrow - USEPA on January 9. The effect of reduced budget conditions, timing for a response from EPA on the work plans, and the status of Michigan's application for authorization to administer the RCRA Section 3004 program were briefly discussed. Barring any furloughs, EPA anticipates submitting comments on the Work Plan and the Quanterra lab audit in mid February.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 318

January 2, 1996

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 22  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 22 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 1995.

Should you need additional information please contact us at your convenience.

Sincerely,



Don C. Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra



**PROGRESS REPORT NO. 22**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD December 1 Through December 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twenty first monthly progress report to EPA on December 01, 1995.

BASF received quotations for drilling services and began reviewing them.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number twenty-one was not presented to the Community Advisory Panel (CAP) in December, 1995 as there was no CAP meeting held. This report will be presented at the January 11, 1996 meeting.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will continue reviewing the quotations for drilling services and complete the selection process.
2. This progress report will be presented at the January 11, 1996 Community Advisory Panel (CAP).
3. BASF will begin work on responding to EPA's modified comments if they are received.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

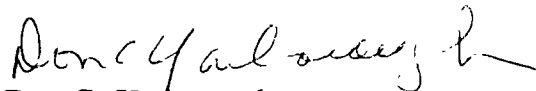
There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don C. Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 320

December 1, 1995

**RECEIVED**

DEC 01 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

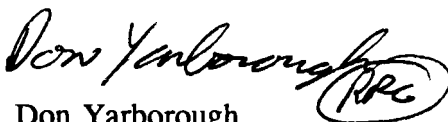
Subject: Monthly Progress Report No. 21  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 21 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 1995.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

## **PROGRESS REPORT NO. 21**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD November 1 Through November 30, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twentieth monthly progress report to EPA on November 06, 1995.

BASF issued the Request for Proposal for drilling services.

BASF submitted a letter to USEPA dated November 22 stating that we would not be able to begin field activities this year because no approval from EPA has been received and it would be too late to begin field work now.

#### **B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress report number twenty was presented to the Community Advisory Panel (CAP) at a meeting on November 09, 1995.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will review the RFPs for drilling services and begin the selection process.
2. This progress report will be presented at the December 14, 1995 Community Advisory Panel (CAP).
3. BASF will begin work on responding to EPA's modified comments if they are received.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

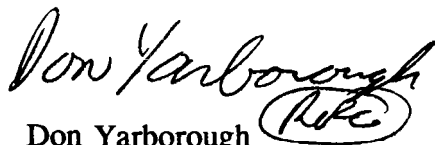
There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

bdr

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 314

November 6, 1995

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

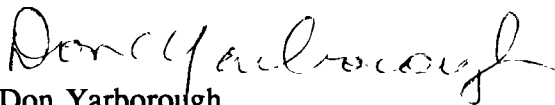
Subject: Monthly Progress Report No. 20  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 20 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 1995.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Z:\WP\PROGRESS.20

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDEQ Lansing  
L. Aubuchon - MDEQ Livonia  
J. Russell - MDEQ Livonia  
T. Himes - Quanterra

**PROGRESS REPORT NO. 20**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD October 1 Through October 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the nineteenth monthly progress report to EPA on October 04, 1995.

BASF submitted partial responses dated October 12 and October 18 to the final comments from EPA dated August 10 concerning the Work Plans.

BASF began working on the Request for Proposal for drilling services.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number nineteen was presented to the Community Advisory Panel (CAP) at a meeting on October 12, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in key personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF anticipates issuing a request for proposal for drilling services
2. This progress report will be presented at the November 9, 1995 Community Advisory Panel (CAP).
3. BASF will begin work on responding to EPA's modified comments when they are received.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were three brief telephone calls between Ms. Diane Sharrow and Mr. Bruce Roberts concerning the QAPP revisions, EPA's anticipated modified comments, and EPA's laboratory audit of Quanterra.

EPA has been delayed in modifying a portion of the laboratory comments contained in the August 10 comments and resolving the open issues; no correspondence is expected until after Thanksgiving. Also, EPA will not be able to respond to the revisions already submitted until after Thanksgiving. EPA will also be issuing a Quanterra laboratory audit report in the future.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



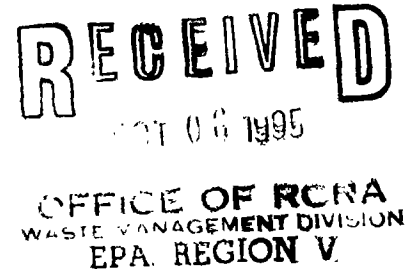
Don Yarborough  
Wyandotte Site Manager



CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 313

October 4, 1995

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604



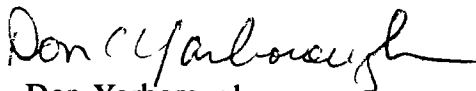
Subject: Monthly Progress Report No. 19  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 19 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 1995.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia  
T. Himes - Quanterra

## **PROGRESS REPORT NO. 19**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD September 1 Through September 30, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the eighteenth monthly progress report to EPA on September 07, 1995.

BASF submitted a partial response on September 22 to the final comments from EPA dated August 10 concerning the Work Plans.

BASF obtained a records preservation agreement with Environmental Science & Engineering, Inc. (RFI Consultant) and with Environmental Standards, Inc. (data validation).

#### **B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress report number eighteen was presented to the Community Advisory Panel (CAP) at a meeting on September 14, 1995.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were two changes in personnel at Quanterra. Mr. Chris Oprandi has replaced Mr. N. Nebiolo as the Quanterra Operations Manager and Ms. L. Ezzo has replaced Ms. D. Crison as the Quanterra Sample Custodian.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF expects to submit the remaining QAPP revisions to EPA based upon EPA's final comments dated August 10.
2. BASF anticipates issuing a request for proposal to well drilling companies for the monitoring wells and piezometer.
3. This progress report will be presented at the October 12, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

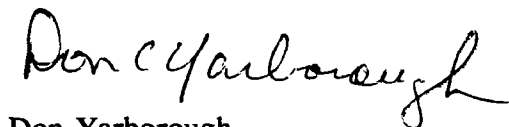
There were three brief telephone calls between Ms. Diane Sharrow and Mr. Bruce Roberts concerning the QAPP revisions, EPA's final comments, and EPA's laboratory audit of Quanterra.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

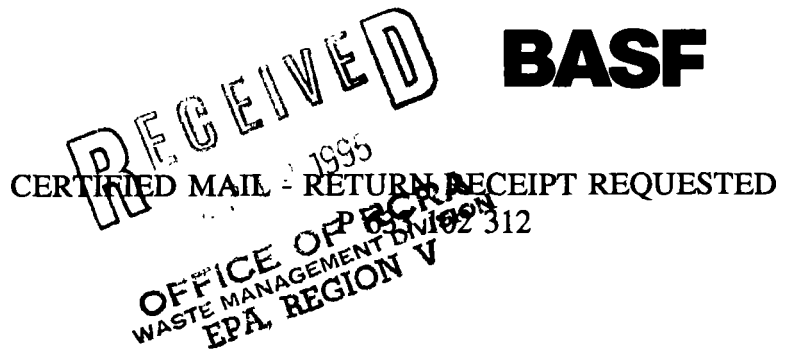
**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

BASF Corporation



September 7, 1995

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 18  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 18 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 1995.

Should you need additional information please contact us at your convenience.

Sincerely,

Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

**PROGRESS REPORT NO. 18**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD August 1 Through August 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the seventeenth monthly progress report to EPA on August 09, 1995.

BASF reviewed the final comments from EPA dated August 10 concerning the Work Plans and began revising the QAPP to reflect the comments.

BASF issued purchase orders to Environmental Science & Engineering, Inc. (RFI Consultant) and to Environmental Standards, Inc. (data validation).

BASF sent information on Environmental Science & Engineering and Environmental Standards to EPA.

BASF sent a copy of the Consent Order to Environmental Science & Engineering and Environmental Standards.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number seventeen was presented to the Community Advisory Panel (CAP) at a meeting on August 10, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There was one change in personnel. Ms. Opel Johnson has replaced Mr. George Gatlin as the Quanterra QA Officer. Mr. Gatlin has assumed other responsibilities at Quanterra.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF expects to submit a revised QAPP to EPA.
2. This progress report will be presented at the September 14, 1995 Community Advisory Panel (CAP).
3. BASF will reach a record preservation agreement with Environmental Science & Engineering and with Environmental Standards.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were a couple of brief telephone calls between Ms. Diane Sharrow and Mr. Bruce Roberts concerning the QAPP and EPA's laboratory audit of Quanterra.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

BASF Corporation

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 310

August 9, 1995

**RECEIVED**

AUG 14 1995

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA REGION V

Subject: Monthly Progress Report No. 17  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan


Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 17 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1995.

I have not included a schedule for selecting the contractor. The wording of the contract with ESE has been agreed upon and our Purchasing Department has assured Mr. Roberts that a purchase order to ESE will be issued this week. A purchase order to Environmental Standards Inc. for the data validation is also expected to be issued this week.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
R. Veenstra - ESE  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

## **PROGRESS REPORT NO. 17**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

#### **REPORTING PERIOD July 1 Through July 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the sixteenth monthly progress report to EPA on July 6, 1995.

BASF continued to review the draft comments from EPA on June 14 concerning the Work Plans.

BASF and ESE agreed upon the wording in the standard BASF Consultant Agreement.

BASF decided to have the data validation done by an independent third party and will be issuing a purchase order next month to Environmental Standards Inc.

#### **B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress report number sixteen was presented to the Community Advisory Panel (CAP) at a meeting on July 20, 1995.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.



**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will issue a purchase order to ESE for the investigation.
2. BASF will issue a purchase order to Environmental Standards Inc. for the data validation.
3. This progress report will be presented at the August 10, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There was a meeting with USEPA on July 20 in Chicago concerning the draft comments. Representatives from Quanterra and ESE also attended. The draft comments were discussed line by line. For most of the items that were not lab items, a common understanding of the QAPP's deficiencies was reached. Many of the lab comments will be addressed during EPA's lab audit of Quanterra.

BASF believes that being able to begin field work this fall will depend upon the time required to resolve the laboratory issues.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

bdr

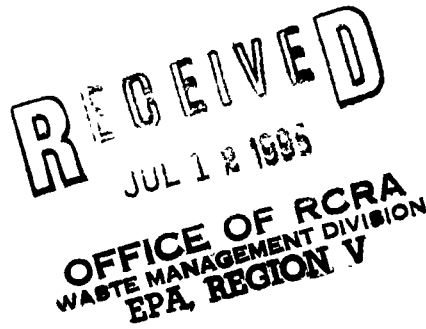
## PLAN FOR SELECTING THE RFI CONSULTANT AT THE BASF NORTH WORKS FACILITY

The BASF plan for selecting the RFI Consultant for the RCRA Corrective Action at the North Works facility is a multi step process. In summary, the major steps are (1) request bids from several consultants, (2) evaluate bids, (3) select top three consultants, (4) request revised RFP, (5) evaluate bids and select the potential RFI consultant, and (6) obtain a contract with the consultant.

Below is complete listing of the steps in the process with actual dates for completed activities and target dates for remaining activities.

1. Request statement of qualifications from several consultants -December 1994
2. Evaluate statement of qualifications and select the top six consultants - December 1994
3. Issue RFP based upon June 1994 Work Plans (bids were due January 31) - January 12, 1995
4. Evaluate the RFPs and select the top three consultants - February 21, 1995  
(The bids were evaluated independently by the BASF team members. Selection criteria considered were corporate qualifications, project organization, qualifications of assigned team, technical approach, support services, and cost estimate.)
5. Joint meeting with the top three consultants to discuss the facility - March 14, 1995
6. Visit by BASF team members at the top consultants' office to learn more about the consultant - week of March 27, 1995
7. Issue revised RFP based upon March 1995 Work Plans - by April 5, 1995 (RFP would be due by April 19, 1995)
8. Evaluate revised RFPs and select the potential top consultant - week of May 1, 1995
9. Obtain contract with top consultant - week of May 22, 1995
10. Notify EPA - week of May 29, 1995

July 7, 1995



Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 16 Attachment

Dear Ms. Sharrow:

The Monthly Progress Report No. 16 attachment for the RFI consultant plan is not correct; the original plan rather than the revised plan was sent.

Attached is the revised Plan for Selecting the RFI Consultant. Please replace the old attachment with this attachment.

Thank you.

Sincerely yours,

A handwritten signature in cursive script that reads "Bruce Roberts".

Bruce Roberts  
Project Coordinator

Attachment - Plan for Selecting the RFI Consultant

cc: D. Yarborough - BASF

## **PLAN FOR SELECTING THE RFI CONSULTANT AT THE BASF NORTH WORKS FACILITY**

The BASF plan for selecting the RFI Consultant for the RCRA Corrective Action at the North Works facility is a multi step process. In summary, the major steps are (1) request bids from several consultants, (2) evaluate bids, (3) select top three consultants, (4) request revised RFP, (5) evaluate bids and select the potential RFI consultant, and (6) obtain a contract with the consultant.

Below is complete listing of the steps in the process with actual dates for completed activities and target dates for remaining activities.

1. Request statement of qualifications from several consultants -December 1994
2. Evaluate statement of qualifications and select the top six consultants - December 1994
3. Issue RFP based upon June 1994 Work Plans (bids were due January 31) - January 12, 1995
4. Evaluate the RFPs and select the top three consultants - February 21, 1995  
(The bids were evaluated independently by the BASF team members. Selection criteria considered were corporate qualifications, project organization, qualifications of assigned team, technical approach, support services, and cost estimate.)
5. Joint meeting with the top three consultants to discuss the facility - March 14, 1995
6. Visit by BASF team members at the top consultants' office to learn more about the consultant - week of March 27, 1995
7. Issue revised RFP based upon March 1995 Work Plans - by April 5, 1995 (RFP would be due by April 19, 1995)
8. Evaluate revised RFPs and select the potential top consultant - week of May 1, 1995
9. Obtain contract with top consultant - week of July 17, 1995
10. Notify EPA - week of July 24, 1995

**BASF Corporation**

**BASF**

June 2, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 308

**RECEIVED**

JUN 06 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 15  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 15 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 1995.

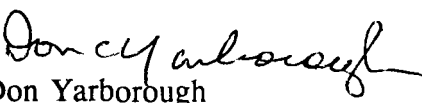
Also attached is a revised Plan for Selecting the RFI Consultant; We have selected Environmental Science & Engineering Inc. but, we have not yet finalized the consultant agreement with ESE. We were delayed in getting our Consent Agreement to ESE and we have just started negotiating.

BASF decided to have an independent third party, that specializes in data validation, do the data validation so, we have issued a RFP. The bids are to be received in early June. We will evaluate the bids, select a firm, and begin contract negotiations in June. BASF does not believe that this will delay any RFI work activities.

I hope that EPA will be able to reach their July goal for our work plans; we would like to complete the field work this year.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report & Plan for Selecting the RFI Consultant

cc: See other side for copy distribution

cc: B. Roberts, BASF  
J.C. Lanigan, Jr., WCC  
R. Blayer, MDNR Lansing  
L. Aubuchon, MDNR Livonia  
J. Russell, MDNR Livonia

**PROGRESS REPORT NO. 15**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD May 1 Through May 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fourteenth monthly progress report to EPA on May 4, 1995.

BASF tentatively selected Environmental Science & Engineering, Inc. (ESE) as the RFI consultant. BASF and ESE have started negotiating wording changes to the standard BASF Consultant Agreement.

BASF issued a RFP to have the data validation done by an independent third party.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number fourteen was presented to the Community Advisory Panel (CAP) at a meeting on May 11, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will complete contract negotiations with ESE.
2. BASF will begin contract negotiations with the contractor that will be doing the data validation.
3. This progress report will be presented at the June 08, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

bdr



## PLAN FOR SELECTING THE RFI CONSULTANT AT THE BASF NORTH WORKS FACILITY

The BASF plan for selecting the RFI Consultant for the RCRA Corrective Action at the North Works facility is a multi step process. In summary, the major steps are (1) request bids from several consultants, (2) evaluate bids, (3) select top three consultants, (4) request revised RFP, (5) evaluate bids and select the potential RFI consultant, and (6) obtain a contract with the consultant.

Below is complete listing of the steps in the process with actual dates for completed activities and target dates for remaining activities.

1. Request statement of qualifications from several consultants -December 1994
2. Evaluate statement of qualifications and select the top six consultants - December 1994
3. Issue RFP based upon June 1994 Work Plans (bids were due January 31) - January 12, 1995
4. Evaluate the RFPs and select the top three consultants - February 21, 1995  
(The bids were evaluated independently by the BASF team members. Selection criteria considered were corporate qualifications, project organization, qualifications of assigned team, technical approach, support services, and cost estimate.)
5. Joint meeting with the top three consultants to discuss the facility - March 14, 1995
6. Visit by BASF team members at the top consultants' office to learn more about the consultant - week of March 27, 1995
7. Issue revised RFP based upon March 1995 Work Plans - by April 5, 1995 (RFP would be due by April 19, 1995)
8. Evaluate revised RFPs and select the potential top consultant - week of May 1, 1995
9. Obtain contract with top consultant - week of May 22, 1995
10. Notify EPA - week of May 29, 1995

June 13, 1995

**RECEIVED**  
JUN 16 1995  
**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 15 Attachment

Dear Ms. Sharrow:

The Monthly Progress Report No. 15 attachment for the RFI consultant plan is not correct; the original plan rather than the revised plan was sent.

Attached is the revised Plan for Selecting the RFI Consultant. Please replace the old attachment with this attachment.

Thank you.

Sincerely yours,



Bruce Roberts  
Project Coordinator

Attachment - Plan for Selecting the RFI Consultant

cc: D. Yarborough - BASF  
J.C. Lanigan, Jr. - WCC  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

## PLAN FOR SELECTING THE RFI CONSULTANT AT THE BASF NORTH WORKS FACILITY

The BASF plan for selecting the RFI Consultant for the RCRA Corrective Action at the North Works facility is a multi step process. In summary, the major steps are (1) request bids from several consultants, (2) evaluate bids, (3) select top three consultants, (4) request revised RFP, (5) evaluate bids and select the potential RFI consultant, and (6) obtain a contract with the consultant.

Below is complete listing of the steps in the process with actual dates for completed activities and target dates for remaining activities.

1. Request statement of qualifications from several consultants -December 1994
2. Evaluate statement of qualifications and select the top six consultants - December 1994
3. Issue RFP based upon June 1994 Work Plans (bids were due January 31) - January 12, 1995
4. Evaluate the RFPs and select the top three consultants - February 21, 1995  
(The bids were evaluated independently by the BASF team members. Selection criteria considered were corporate qualifications, project organization, qualifications of assigned team, technical approach, support services, and cost estimate.)
5. Joint meeting with the top three consultants to discuss the facility - March 14, 1995
6. Visit by BASF team members at the top consultants' office to learn more about the consultant - week of March 27, 1995
7. Issue revised RFP based upon March 1995 Work Plans - by April 5, 1995 (RFP would be due by April 19, 1995)
8. Evaluate revised RFPs and select the potential top consultant - week of May 1, 1995
9. Obtain contract with top consultant - week of June 18, 1995
10. Notify EPA - week of June 25, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

**RECEIVED**

633 102 307

MAY 08 1995

May 4, 1995

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

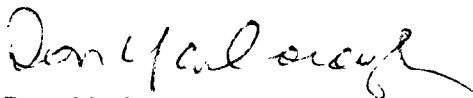
Subject: Monthly Progress Report No. 14  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 14 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 1995.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment  
F:\ADMINIST\PRGRES14.KMB

Attachment - Progress Report

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

**PROGRESS REPORT NO. 14**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD April 1 Through April 30, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the thirteenth monthly progress report to EPA on April 6, 1995.

BASF continued the process of selecting the RFI consultant. BASF submitted revised RFPs to three potential consultants. The revised RFPs were received on April 18 and they are being evaluated.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number twelve was presented to the Community Advisory Panel (CAP) at a meeting on April 13, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will pick the top RFI consultant and begin contract negotiations with the consultant.
2. This progress report will be presented at the May 11, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

Don Yarborough  
Wyandotte Site Manager

F:\ADMINIST\PRGRES14.KMB

BASF Corporation

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 306

April 6, 1995

**RECEIVED**

APR 12 1995

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

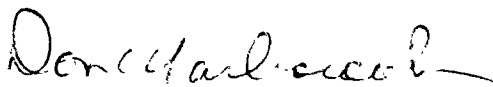
Subject: Monthly Progress Report No. 13  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 13 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 1995.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

**PROGRESS REPORT NO. 13**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD March 1 Through March 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the twelfth monthly progress report to EPA on March 3, 1995.

BASF sent revised work plans and portions of the Current Conditions Report to EPA on March 29, 1995. BASF sent a revised budget to EPA on March 28, 1995.

BASF continued the process of selecting the RFI consultant. BASF hosted a meeting for the top three potential consultants on March 14 and BASF personnel visited the office of each of the three consultants during the week of March 27.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number ten was presented to the Community Advisory Panel (CAP) at a meeting on March 09, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.



**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will issue another RFP to the top three potential consultants. The RFP will be based upon the revised work plans submitted on March 29. BASF will also begin evaluating the RFPs.
2. BASF will continue the selection process for the RFI consultant.
3. This progress report will be presented at the April 13, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

BASF Corporation

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 304

March 3, 1995

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**RECEIVED**

MAR 08 1995

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
**EPA, REGION V**

Subject: Monthly Progress Report No. 12  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

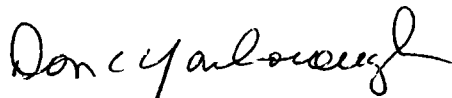
Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 12 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of February 1995.

Also attached is a verification of a telephone conversation between you and Mr. Bruce Roberts held on February 21.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment - Progress Report only

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

**PROGRESS REPORT NO. 12**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD February 1 Through February 28, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the eleventh monthly progress report to EPA on February 3, 1995.

BASF received follow up information from the February 21, 1995 telephone conversation between Ms. Diane Sharrow and Mr. Bruce Roberts.

BASF and Woodward Clyde began revising the QAPP to address EPA's comments.

BASF began the process of selecting the RFI consultant.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number 11 was presented to the Community Advisory Panel (CAP) at a meeting on February 09, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will finish revising the RFI work plans per EPA's final comments.
2. BASF will continue the selection process for the RFI consultant.
3. This progress report will be presented at the March 09, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**


There was a telephone discussion between Ms. Diane Sharrow and Mr. Bruce Roberts on February 21.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

**BASF Corporation**  
March 1, 1995

**BASF**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**RECEIVED**  
MAR 08 1995

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
**EPA, REGION V**

Subject: Verification of telephone conversation on 02/21/95

Dear Ms. Sharrow:

This is to confirm our telephone conversation on February 21, 1995. I requested a clarification of two items on page 20 of your final comments dated January 25, 1995. The items concerned revisions that should be made to Section 1.3 of the DCC. I stated that there was not a Section 1.3 in the DCC and that BASF wanted to address EPA's comments. You said that you would check into this and let me know.

We had a general discussion rigidity of the "schedule for RFI activities". The schedule is a tool to keep the program moving and to keep people informed of the status of the work. You said that EPA did not have to give formal approval for changes of a few days for activities in the middle of the project. However, you emphasized that we did have to consider the impact changes would have on the overall project schedule and the potential impact from the public. We would need to make a determination as to what type of notification to EPA would be required. We do need to keep EPA informed of changes.

I gave you a very brief summary of our plans for selecting the RFI consultant. You agreed that we could submit a detailed description of our plans and timetable when we submit the revised work plans.

We also had a general discussion concerning sediments. EPA does not have very much information concerning the behavior of the Trenton Channel right in front of the Northworks facility and wants BASF to characterize the channel. EPA believes that this request is reasonable and is in line with what other facilities might have to do. The results of the characterization, from existing data, would determine the need to conduct field activities. You mentioned that during the early negotiations, BASF stated that they did not want to have to come back later and do something that should have been done as part of the Consent Order. EPA believes that sediment concerns must be addressed now.

If this verification does not accurately reflect our conversation, please advise.

Thank you.

Sincerely yours,

*Bruce Roberts*

Bruce Roberts  
Project Coordinator

BASF Corporation

**BASF**

February 3, 1995

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 303

**RECEIVED**  
FEB 06 1995

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604


Subject: Monthly Progress Report No. 11  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 11 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of January 1995.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr

Attachment

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

**PROGRESS REPORT NO. 11**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD January 1 Through January 31, 1995**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the tenth monthly progress report to EPA on January 3, 1995.

BASF received EPA's final comments on the RFI work plan on January 27, 1995.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number nine was presented to the Community Advisory Panel (CAP) at a meeting on January 12, 1995.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will begin revising the RFI work plans per EPA's final comments.
2. BASF will begin the selection process for the RFI consultant.
3. This progress report will be presented at the February 9, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

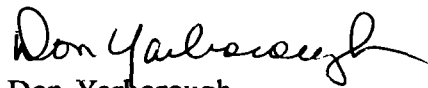
There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr



CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 300

January 3, 1995

**RECEIVED**  
JAN 12 1995

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA, REGION V

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 10  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 10 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of December 1994.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarborough  
Wyandotte Site Manager

bdr

Attachment

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
R. Blayer - MDNR Lansing  
L. Aubuchon - MDNR Livonia  
J. Russell - MDNR Livonia

**PROGRESS REPORT NO. 10**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD December 1 Through December 31, 1994**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the ninth monthly progress report to EPA on December 2, 1994.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number nine was presented to the Community Advisory Panel (CAP) at a meeting on December 15, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. This progress report will be presented at the January 12, 1995 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

Bruce Roberts had a telephone conversation with Ms. Diane Sharrow on December 21, 1994. The purpose of the conversation was to verify if there is an EPA requirement to specify the RFI consultant in the final Work Plans. Ms. Sharrow will investigate and send a written response to B. Roberts. A telephone conversation verification letter was sent to Ms. Sharrow.

Ms. Sharrow stated that in early January EPA should be submitting their final comments on the June 1994 Work Plans.

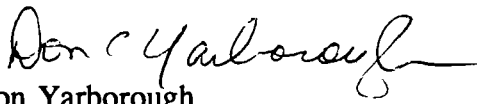
Ms. Sharrow also requested that two changes be made to the distribution of the progress reports. As requested, Mr. P. Schrantz has been replaced with Ms. R. Blayer and Mr. L. Aubuchon MDNR Livonia has been added.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

bdr

BASF Corporation

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 299

December 2, 1994

**RECEIVED**  
DEC 07 1994

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

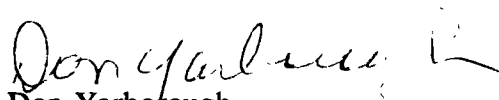
Subject: Monthly Progress Report No. 9  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 9 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of November 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

bdr  
Attachment

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
J. Russell - MDNR Livonia  
P. Schrantz - MDNR Lansing

**PROGRESS REPORT NO. 9**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD November 1 Through November 30, 1994**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the eight monthly progress report to EPA on November 2, 1994.

BASF submitted a copy of a report by Beak Consultants Limited entitled "Environmental Assessment of Detroit River Sediments and Benthic Macroinvertebrate Communities -- 1991" on November 11, 1994.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number eight was presented to the Community Advisory Panel (CAP) at a meeting on November 10, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

There were no changes in personnel.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. This progress report will be presented at the December 15, 1994 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspections were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no meetings or discussions with USEPA.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

bdr

November 2, 1994

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 292

**RECEIVED**  
NOV 08 1994

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
**EPA, REGION V**

Subject: Monthly Progress Report No. 8  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 8 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of October 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Don C. Yarborough  
Wyandotte Site Manager

bdr

Attachment

cc: B. Roberts - BASF  
J.C. Lanigan, Jr. - WCC  
J. Russell - MDNR Livonia  
P. Schrantz - MDNR Lansing

**PROGRESS REPORT NO. 8**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD October 1 Through October 31, 1994**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the seventh monthly progress report to EPA on October 13, 1994.

BASF representatives attended a meeting with EPA on October 17, 1994. The purpose of the informal meeting was to discuss the draft QAPP comments.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number seven was presented to the Community Advisory Panel (CAP) at a meeting on October 13, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

Effective October 17, Mr. Bruce Roberts (BASF) replaced A. Bickel as BASF Project Coordinator.



**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. This progress report will be presented at the November 10, 1994 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

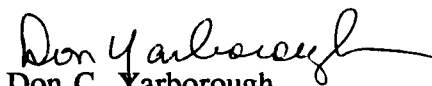
1. An informal meeting between EPA and BASF to discuss EPA's draft comments was held on October 17, 1994, from 9:00 a.m. to 2:00 p.m., in Room 811 of the Metcalfe Federal Building. Representatives from PRC, Woodward-Clyde, and Quanterra were also present. Per EPA's request, monthly progress reports will be sent to Messrs. John Russell and Phil Schantz at MDNR in Livonia.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don C. Yarborough  
Wyandotte Site Manager

bdr

**BASF Corporation**

**BASF**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

P 633 102 298

October 13, 1994

**RECEIVED**  
OCT 17 1994

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
**EPA, REGION V**

Subject: Monthly Progress Report No. 7  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 7 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of September 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

Attachment  
F:\ECOLOGY\PROGRESS.7

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

**PROGRESS REPORT NO. 7**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD September 1 Through September 30, 1994**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the sixth monthly progress report to EPA on September 7, 1994.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number six will be presented to the Community Advisory Panel (CAP) at a meeting on October 13, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

There were no problems encountered.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

There were no problems encountered.

**G. CHANGES IN THE KEY PERSONNEL**

Mr. Bruce Roberts (BASF) will be replacing A. Bickel as BASF Project Coordinator. The effective date has not yet been determined but is expected to be in October 1994. BASF will contact the EPA when the October effective date is finalized.

#### **H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. BASF will contact the EPA when the October effective date is finalized for the Project Coordinator personnel change.
3. BASF will attend a meeting with EPA to discuss the EPA's draft comments on the QAPP on October 17, 1994.
4. This progress report will be presented to the Community Advisory Panel (CAP) at a meeting on October 13, 1994.

#### **I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

#### **J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**


1. D. Sharrow (EPA) and A. Bickel (BASF) participated in a telephone conversation on September 13, 1994 regarding the EPA's intent to submit written draft comments on the QAPP to BASF and to schedule a meeting to discuss those comments in October 1994.
2. Received a letter from D. Sharrow (EPA) dated September 29, 1994, with EPA's draft comments on the QAPP enclosed. The meeting between EPA and BASF to discuss the comments will be held on October 17, 1994, from 9:00 a.m. to 2:30 p.m., in Room 811 of the Metcalfe Federal Building.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

acb

**BASF Corporation**

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 287

September 7, 1994

**RECEIVED**  
SEP 12 1994

**OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V**

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

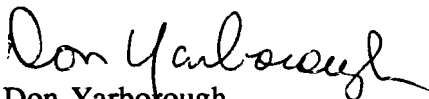
Subject: Monthly Progress Report No. 6  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached Monthly Progress Report No. 6 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of August 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

acb

Attachment

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

## **PROGRESS REPORT NO. 6**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD August 1 Through August 31, 1994**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

1. BASF submitted the fifth monthly progress report to EPA on August 10, 1994.
2. BASF submitted the Budget section of the Project Management Plan as Confidential Business Information on August 9, 1994.
3. BASF submitted copies of the Quality Assurance Project Plan, as per D. Sharrow's (EPA) request, to Ms. Ronda Blayer, MDNR, Waste Management Division, and Ms. Mary Vanderleen, MDNR, Environmental Response Division on August 23, 1994.

#### **B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress report number five was presented to the Community Advisory Panel (CAP) at a meeting on August 11, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

The teleconference among BASF, EPA, and MDNR to discuss the Consent Order has not been scheduled.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

The communication between BASF, EPA, and MDNR has been initiated through D. Sharrow's (EPA) letter dated August 11, 1994, to Ms. Ronda Blayer, MDNR, Waste Management Division, and Ms. Mary Vanderleen, MDNR, Environmental Response Division requesting comments on Act 64 and Act 307 concerns relative to the RCRA corrective action process.

**G. CHANGES IN THE KEY PERSONNEL**

Mr. Bruce Roberts (BASF) will be replacing A. Bickel as BASF Project Coordinator. The effective date has not yet been determined but is expected to be in October 1994. BASF will contact the EPA when the October effective date is finalized. BASF would like to extend an invitation for a meeting with EPA to facilitate the Project Coordinator transition.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. BASF will contact the EPA when the October effective date is finalized for the Project Coordinator personnel change and to schedule a meeting with EPA to facilitate the transition.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

1. Received a letter from D. Sharrow (EPA) dated August 11, 1994, requesting BASF to submitted copies of the Quality Assurance Project Plan to Ms. Ronda Blayer, MDNR, Waste Management Division, and Ms. Mary Vanderleen, MDNR, Environmental Response Division.

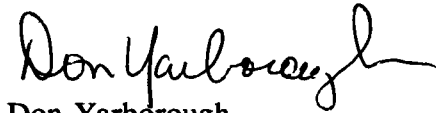
2. Received a letter from D. Sharrow (EPA) to Mr. Mike DeCapita (FWS), dated August 17, 1994, requesting from the Fish and Wildlife Service (FWS) a listing of endangered, threatened, or proposed species or its critical habitat that would or might be affected by the corrective action activities.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

acb



**BASF Corporation**

**BASF**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

P 633 102 297

August 10, 1994

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

Subject: Monthly Progress Report No. 5  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 5 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of July 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Don Yarborough  
Wyandotte Site Manager

**Attachment**

F:\WP\PROGRESS.5

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

**PROGRESS REPORT NO. 5**

**RCRA FACILITY INVESTIGATION PHASE  
BASF CORPORATION  
WYANDOTTE, MICHIGAN**

**REPORTING PERIOD July 1 Through July 31, 1994**

This monthly Progress Report is submitted in accordance with Section XIV. A. of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

**A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

BASF submitted the fourth monthly progress report to EPA on July 1, 1994.

**B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

Progress report number four was presented to the Community Advisory Panel (CAP) at a meeting on July 14, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

The teleconference among BASF, EPA, and MDNR to discuss the Consent Order has not been scheduled.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

BASF continues to work with the EPA in attempting to schedule a teleconference with the MDNR.

**G. CHANGES IN THE KEY PERSONNEL**

There are no changes.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. BASF will submit the Budget section of the Project Management Plan as Confidential Business Information. Although it was intended to be a separate filing, it was inadvertently left out of the May 27, 1994 submission of the Project Management Plan.
3. This progress report will be presented at the August 11, 1994 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

A. Bickel (BASF) and D. Sharrow (EPA) participated in a telephone conversation on July 13, 1994. Topics of conversation included verifying receipt of all RFI workplans and reports, estimated timeframe for EPA's approval of RFI plans and reports, and future submittal of the Budget section of the Project Management Plan as Confidential Business Information. In addition, BASF extended an invitation for a review meeting with EPA to facilitate the review process.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**



Don Yarborough  
Wyandotte Site Manager

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 281

July 1, 1994  
4E07014-400

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

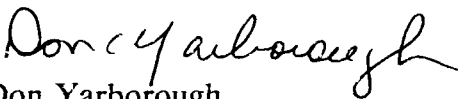
Subject: Monthly Progress Report No. 4  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 4 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of June 1994.

Should you need additional information please contact us at your convenience.

Sincerely,

  
Don Yarborough  
Wyandotte Site Manager

JCL:dcB

Attachment

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

DET21517

## **PROGRESS REPORT NO. 4**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD June 1 Through June 30, 1994**

This monthly Progress Report is submitted in accordance with Section XIV.A of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

1. Work continued on the Quality Assurance Project Plan (QAPP) and the Current Conditions Report (CCR).
2. BASF submitted the CCR and QAPP to the EPA on June 29, 1994.
3. BASF submitted the third monthly progress report to EPA on June 1, 1994.

#### **B. WORK COMPLETED**

100% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

Progress report number three was presented to the Community Advisory Panel (CAP) at a meeting on June 9, 1994.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

The teleconference among BASF, EPA, and MDNR to discuss the Consent Order has not been scheduled.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

BASF continues to work with the EPA in attempting to schedule a teleconference with the MDNR.

**G. CHANGES IN THE KEY PERSONNEL**

Effective June 1, 1994, Mr. Don Yarborough replaced Mr. Gary Durst as the Wyandotte Site Manager.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. BASF will await approval of the RFI Work Plans.
2. This progress report will be presented at the July 14, 1994 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

There were no significant discussions or correspondence between BASF and EPA during June.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

All scheduled work was completed. The RFI schedule was submitted with the work plans.

This report was completed by:

**BASF CORPORATION**

  
Don Yarborough  
Wyandotte Site Manager

JCL:kan

**BASF Corporation**

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

P 633 102 278

June 1, 1994  
4E07014-400

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION V  
CHICAGO, ILLINOIS 60604


Subject: Monthly Progress Report No. 3  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 3 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of May 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Gary T. Durst  
Wyandotte Site Manager

JCL:dcB

Attachment

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

DET21471

## **PROGRESS REPORT NO. 3**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD May 1 Through May 31, 1994**

This monthly Progress Report is submitted in accordance with Section XIV.A of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

1. Work continued on the RFI Work Plan, Current Conditions Report, and Pre-Investigation Evaluation of Corrective Measure Technologies Report.
2. BASF submitted the Project Management Plan, Data Management Plan, Health and Safety Plan, Public Participation Plan, and Pre-Investigation Evaluation of Corrective Measure Technologies to the EPA on May 27, 1994.
3. BASF requested an extension of 30 days to submit the Current Conditions Report (CCR) and the Quality Assurance Project Plan (QAPP) from EPA on May 19, 1994.
4. BASF submitted the second monthly progress report to EPA on May 9, 1994.
5. On May 24, 1994, EPA granted BASF a 30 day extension for the submission of the Current Conditions Report (CCR) and the Quality Assurance Project Plan (QAPP).

#### **B. WORK COMPLETED**

Approximately 80% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.



**D. COMMUNITY RELATIONS**

Progress report number two was presented to the Community Advisory Panel (CAP) at a meeting on May 12, 1994.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

Documentation of pre-1980 information has proven sparse and/or difficult to obtain.

A teleconference among BASF, EPA, and MDNR to discuss the Consent Order has not been scheduled.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

BASF continues to work with the EPA in attempting to schedule a teleconference with the MDNR.

**G. CHANGES IN THE KEY PERSONNEL**

Mr. Don Yarborough will be the Wyandotte Site Manager as of June 1, 1994, replacing Mr. Gary Durst.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Work will continue on the Current Conditions Report and QAPP. These documents are due to the EPA by June 27, 1994.
2. This progress report will be presented at the June 9, 1994 Community Advisory Panel (CAP) meeting.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

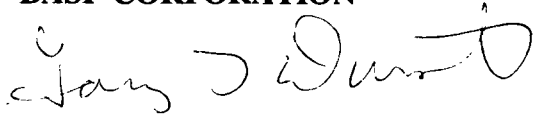
A. Bickel (BASF) and D. Sharrow (EPA) participated in a telephone conversation on May 17, 1994. Topics of conversation included arranging a teleconference among BASF, EPA, and MDNR, estimated timeframe for EPA's approval of RFI plans and reports, and an extension request for the submittal of the CCR and QAPP. EPA agreed to the revised submittal date.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The work is proceeding according to the revised schedule. The QAPP and CCR are due to the EPA on June 30, 1994.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in cursive script, appearing to read "Gary T. Durst".

Gary T. Durst  
Wyandotte Site Manager

JCL:kan

**BASF Corporation**

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 272

May 9, 1994  
4E07014-400

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**RECEIVED**  
MAY 11 1994

**OFFICE OF RCRA  
WASTE MANAGEMENT DIVISION  
EPA, REGION V**

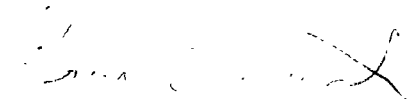
Subject: Monthly Progress Report No. 2  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 2 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of April 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Gary T. Durst  
Wyandotte Site Manager

JCL:dcB

Attachment

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

DET21447

## **PROGRESS REPORT NO. 2**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

**REPORTING PERIOD April 1 Through April 30, 1994**

This monthly Progress Report is submitted in accordance with Section XIV.A of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

1. Work continued on the RFI Work Plan, Current Conditions Report, and Pre-Investigation Evaluation of Corrective Measure Technologies Report. These reports are due to EPA by May 31, 1994.
2. The pre-QAPP meeting was held on April 14, 1994 at EPA Region V offices in Chicago.
3. The first monthly progress report was submitted to EPA on April 8, 1994.

#### **B. WORK COMPLETED**

Approximately 60% of the RFI work plan (i.e., Tasks I, II, and III) has been completed to date.

#### **C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

#### **D. COMMUNITY RELATIONS**

No activity.

#### **E. SUMMARY OF PROBLEMS ENCOUNTERED**

Documentation of pre-1980 information has proven sparse and/or difficult to obtain.

#### **F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

Not applicable at this stage.

**G. CHANGES IN THE KEY PERSONNEL**

Not applicable.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Work will continue on the RFI work plan, Current Conditions Report, and Pre-evaluation of Corrective Measure Technologies Report. These documents are due to the EPA by May 31, 1994.
2. This progress report will be presented at the May 12, 1994 Community Advisory Panel (CAP).

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection were performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

1. BASF and Woodward-Clyde submitted a draft agenda for the pre-QAPP meeting to EPA on April 11, 1994. EPA adopted the agenda without change.
2. BASF, Woodward-Clyde, EPA, and Enseco participated in the pre-QAPP meeting at EPA on April 14. Highlights of discussion focussed on:
  - Data Quality Objective - define decision making process in QAPP, if the approach in the QAPP meets the DQOs, the approach is acceptable.
  - The QAPP and sampling plan will focus on the facility as a whole to meet the objectives in the Consent Order.
  - The QAPP will focus on chemicals that can leave the facility through groundwater discharge and surface water runoff.
  - Analytical methods that meet stated DQOs are acceptable.
  - Data validation by consultant will focus on some percentage of total laboratory output. A value of approximately 10% was discussed. Validation will focus on data that may look "odd".
  - All intended QC sampling frequencies will be in QAPP. A frequency of 1:20 MS/MSD sampling was acceptable, as long as DQOs are met.

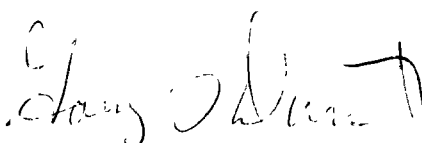
- For existing (old) data, EPA stated that the more information available on acquisition of the data, the more readily EPA would accept usage of the data.
  - EPA stated their desire to keep the Michigan Department of Natural Resources (MDNR) "on board".
  - EPA recognized that the Detroit River is not "pristine". Significant sources of chemicals exist upstream from BASF. Sampling sediments and water from the Detroit River would not contribute to meeting the objectives of Consent Order.
  - EPA suggested holding a teleconference among MDNR, BASF and EPA to maintain communications and compliance with state regulations.
3. J. Lanigan (Woodward-Clyde) and D. Sharrow (EPA) participated in a telephone conversation on April 5, 1994. The tentative dates for the pre-QAPP meeting were discussed. Additionally, EPA stated they are uncertain of the effectiveness of the corrective measures currently operating at the North Works.
  4. A. Bickel and D. Sharrow (EPA) participated in a telephone conversation on April 19, 1994. The pre-QAPP meeting was discussed briefly. Additionally, tentative dates for a teleconference among MDNR, BASF and EPA to maintain communications and compliance with state regulations was discussed.

#### **K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The work is proceeding as scheduled. The reports and work plan are due to the EPA at the end of May.

This report was completed by:

#### **BASF CORPORATION**



Gary T. Durst  
Wyandotte Site Manager

JCL:dcb

**BASF Corporation**

**BASF**

CERTIFIED MAIL - RETURN RECEIPT REQUESTED  
P 633 102 271

April 8, 1994

Ms. Diane Sharrow  
Project Manager  
United States Environmental Protection Agency  
Region V, (HRE-8J)  
77 West Jackson Street  
Chicago, Illinois 60604

**RECEIVED**  
APR 11 1994

**OFFICE OF RCRA**  
WASTE MANAGEMENT DIVISION  
EPA, REGION V


Subject: Monthly Progress Report No. 1  
RCRA Facility Investigation Phase  
BASF Corporation, Wyandotte, Michigan

Dear Ms. Sharrow:

BASF Corporation submits the attached monthly Progress Report No. 1 for the work performed under the Administrative Order on Consent (Docket No.: V-W-011-94) during the month of March 1994.

Should you need additional information please contact us at your convenience.

Sincerely,



Gary T. Durst  
Wyandotte Site Manager

Attachment

cc: A. Bickel - BASF  
J.C. Lanigan, Jr. - WCC

DET21392

## **PROGRESS REPORT NO. 1**

### **RCRA FACILITY INVESTIGATION PHASE BASF CORPORATION WYANDOTTE, MICHIGAN**

#### **REPORTING PERIOD FEBRUARY 28 Through MARCH 31, 1994**

This monthly Progress Report is submitted in accordance with Section XIV.A of the Administrative Order on Consent for a RCRA Facility Investigation (RFI) phase of the work. This report summarizes activities performed during this reporting period and describes activities scheduled for the next reporting period.

#### **A. ACTIVITIES PERFORMED DURING THE REPORTING PERIOD**

1. The Administrative Order on Consent (Consent Order) was signed by EPA on February 24, 1994, with an effective date of February 28, 1994.
2. The EPA issued an environmental new release on March 11, 1994.
3. BASF selected Woodward-Clyde Consultants to prepare the RFI Work Plans and other supporting documents. Woodward-Clyde received a copy of the Consent Order on March 11, 1994.
4. BASF submitted to the EPA on March 14, 1994 the statement of qualifications as required by Section IX. B. of the Consent Order. The statement of qualifications include the name, title, and qualifications of the engineers and geologist that will be used in carrying out the terms of the Order.

These individuals include Barry Barkel and John Byrnes from BASF Corporation and John Lanigan and John Seymour from Woodward-Clyde (retained contractor/consultant).

5. BASF retained ENSECO Wadsworth/Alert to perform chemical analyses and to assist with preparation of the Quality Assurance Project Plan (QAPP).
6. Work began on the RFI Workplan, Current Conditions Report, and Pre-Investigation Evaluation of Corrective Measure Technologies Report.



**B. WORK COMPLETED**

Approximately 10% of the RFI work (i.e., Tasks I, II, and III) has been completed to date.

**C. SUMMARY OF THE FINDINGS AND CHANGES**

There are no findings or changes.

**D. COMMUNITY RELATIONS**

On March 10, 1994, BASF Corporation presented a summary of the RCRA Corrective Action process and the main objectives of the Order to the Community Advisory Panel (CAP). The development of the CAP is consistent with the Community Awareness and Emergency Response Code of the Chemical Manufacturers Association Responsible Care® initiative.

**E. SUMMARY OF PROBLEMS ENCOUNTERED**

Documentation of pre-1980 information has proven sparse and/or difficult to obtain.

**F. SUMMARIES OF SOLUTION TO THE PROBLEMS ENCOUNTERED**

Not applicable at this stage.

**G. CHANGES IN THE KEY PERSONNEL**

Not applicable.

**H. PROJECTED WORK FOR THE NEXT REPORTING PERIOD**

1. Work will continue on the RFI work plan, Current Conditions Report, and Pre-Investigation Evaluation of Corrective Measure Technologies Report.
2. The pre-QAPP meeting will be held on April 14, 1994 with representatives from the EPA, BASF, and Woodward-Clyde Consultants.

**I. COPIES OF DAILY REPORTS INCLUDING INSPECTION AND MONITORING DATA**

No monitoring or inspection performed.

**J. SUMMARIES OF MEETINGS AND DISCUSSIONS WITH USEPA**

D. Sharrow (EPA) and A. Bickel (BASF) participated in a telephone conversation on March 22, 1994 regarding the size of the maps required for the Current Conditions Report. D. Sharrow stated that the map should be that smallest size that is still legible.

**K. COMPARISON OF WORKING SCHEDULE WITH PROJECT SCHEDULE**

The work is proceeding as scheduled. The reports and work plan are due to the EPA at the end of May.

This report was completed by:

**BASF CORPORATION**

A handwritten signature in black ink, appearing to read "Gary Durst", with a stylized flourish at the end.

Gary Durst  
Wyandotte Site Manager